

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YIEN-KOO KING,

Plaintiff,

v.

ANDREW WANG, et al.,

Defendant.

Case No: 14-cv-7694

JOINT PRETRIAL ORDER

A. Trial Counsel

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B. Subject Matter Jurisdiction

Plaintiff's Statement: The Court has federal question jurisdiction over Plaintiff's RICO claims and has taken pendent jurisdiction over Plaintiff's state law claims. 28 U.S.C. §§ 1331 and 1337(a).

Defendants' Position: Without waiver of their rights to appeal prior determinations reached by this Court as to statute of limitations issues, Defendants agree that the Court has subject matter jurisdiction.

C. Summary of Claims & Defenses Remaining to Be Tried

The claim that Defendants conspired to purchase 98 paintings from the Estate, using fictitious third-party buyers, based upon allegedly fraudulent representations which Plaintiff claims injured the Estate's business or property in alleged violation of the following Federal RICO laws: 18 U.S.C. §1962 (c) and (d) for conspiring to and engaging in predicate activity in violation of 18 U.S.C. §1343 (wire fraud); 18 U.S.C. §1956(a) (money laundering); 18 U.S.C. §1957 (money laundering); 18 U.S.C. 2314 (shipping fraudulently acquired goods).

The claim that the sales of the 98 Paintings violated Andrew Wang's fiduciary duty to the Estate;

The claim that Shou-Kung Wang aided and abetted Andrew Wang's breach of his fiduciary duty in relation to one or more of the sales of the 98 Paintings;

The claim that the sales of the 98 Paintings were fraudulent;

The claim that Shou-Kung Wang conspired with Andrew Wang to defraud the Estate;

The defense that Andrew Wang acted in accordance with the procedures set by the Public Administrator;

The defense that Defendants' conduct did not violate RICO or any fiduciary duties;

The defense that Plaintiff had actual notice of her alleged claims on an early enough date that the applicable statutes of limitations bar them;

The defense that Plaintiff has not established any injury;

Claims and Defenses Previously Asserted But Not to Be Tried:

Civil RICO liability under §1962(a) (withdrawn);

For a Constructive Trust of converted artwork (dismissed);

For Replevin (dismissed);

For Violations of New York Debtor and Creditor Law §270 (dismissed);

Conversion (withdrawn);

The defense of accord and satisfaction;

The defense of unclean hands;

The defense of laches;

The defense of failure to join a necessary party;

The defense of the statute of frauds;

The defense of the absence of privity;

The defense of illegality;

The defense of offset; and

The defense of lack of subject matter jurisdiction.

D. Jury Trial Days¹

This matter is to be tried to a jury. The parties have not consented to trial by a magistrate judge.

¹ Plaintiff and Defendants are currently negotiating a stipulation to remove a significant number of factual issues relating to pre-death conduct from the trial. They believe it is likely that they will reach such an agreement, which will then impact the number of necessary trial days, the exhibits, the witnesses, and deposition designations. The potential impact of such a stipulation will be addressed within each relevant

Plaintiff's Position as to Trial Days: The number of trial days depends on the Court's determination as to the entry of evidence. The Plaintiff believes the entire trial will take approximately 8-12 days. If the parties re-litigate issues surrounding the 2003 probate contest or alleged thefts from CC Wang, the Plaintiff expects trial to take 12-15 days given that the original 2017 probate trial lasted 8 days and that the Defendants have designated additional 10 witnesses to testify on these issues.

Defendants' Position as to Trial Days: Based upon the evidentiary rulings made on the motions in *limine*, and in the absence of an agreement to further limit the issues, Defendants believe the trial will require 15 days.

E. Summary of Nature of the Case, For Jury Selection

Chi-Chuan "C.C." Wang was a noted Chinese artist and collector, who died in July, 2003. After his death, a probate contest arose between the Plaintiff Yien-Koo King (C.C.'s youngest daughter) Defendants Shou-Kung ("S.K.") Wang (C.C. Wang's son), and Andrew Wang (S.K.'s son and grandson of C.C.). The New York courts appointed a public official known as the Public Administrator to serve as the co-fiduciary of C.C. Wang's estate alongside Andrew Wang. During their administration of the Estate, the co-fiduciaries sold 98 classical Chinese paintings at issue in this action through six private sales between 2005 and 2009.

The Plaintiff, Yien-Koo King, who is bringing this case on behalf of the Estate of Chi-Chuan Wang, alleges that those private sales were fraudulent and that the paintings were actually purchased by Andrew Wang and his father Shou-Kung Wang at discount prices **using overseas accounts. The Plaintiff further alleges that the Defendants then auctioned some of the 98 privately sold Estate paintings in China.**² Defendants deny those accusations. Andrew Wang asserts that the sales were made to third parties at appropriate and reasonable values; S.K. Wang denies having anything to do with the sales or purchases at all.

Based on those and other allegations, Ms. King has alleged claims on behalf of the Estate of Chi-Chuan Wang that the Defendants conspired to commit fraud, violated federal RICO laws and that Andrew Wang, with the aid of his father SK, violated his fiduciary duty to the Estate. I will instruct you on the law applicable to those claims at a later time

F. List of People, Places, and Institutions, For Jury Selection

Bao Wu Tang

subsection of this Order, and the parties will provide an updated Joint Pretrial Order as soon as such stipulation is reached.

² Defendants object to the red text being included in the description of the case provided to the jury at jury selection as an inappropriate level of detail for the purpose. The Plaintiff responds that such activity was predicate activity under 18 U.S.C. 1957(a) and is relevant to the scope of the Estate's RICO claim just as much as the wire frauds for the paintings are.

Chieftown Auction House

Capital Museum in Beijing

Poly Auction House

China Guardian Auction House

Sotheby's

The Metropolitan Museum of Art

Chi-Chuan Wang

Ethel Griffin

The Public Administrator of New York

O'Toole Ewald Art Associates

Kenneth King³

Northwich

Soon Huat

Tie Fung

G. Trial Witnesses⁴

Plaintiff's Trial Witnesses

Andrew Wang (Live and by Deposition)—Andrew Wang is expected to testify concerning his role in the collection, inventorying, management and sale of Estate assets—including Estate paintings and C.C. Wang's seals. He is further expected to testify about his art business and his father's knowledge and control of C.C. Wang's collection of classical Chinese Paintings. Mr. Wang is further expected to testify as to his and his father's corporate holdings. If permitted, Andrew Wang will testify concerning his account of a two-day settlement exchange in Shanghai in May 2005.

Raymond King (Live)—Raymond King is expected to testify concerning his interactions with Andrew Wang regarding Andrew Wang's allegations against Y.K. King. Mr. King will also testify concerning his participation in and observations of the interactions and relationship between Andrew Wang and Shou-Kung Wang. Mr. King is also expected to authenticate certain records as needed. If permitted, Andrew Wang will testify concerning his account of a two-day settlement exchange in Shanghai in May 2005.

³ Reference to the final four names may be deleted if the parties enter the contemplated stipulation.

⁴ Trial witnesses whose testimony may not be necessary if the parties reach the contemplated stipulation are highlighted in yellow.

John S. Wang (by Deposition) – John S. Wang is expected to testify concerning C.C. Wang seals he made impressions of in 2001 at C.C. Wang’s apartment in Manhattan. Mr. Wang is also expected to authenticate certain records as needed.

Glenn Opell (Live) – Glenn Opell is expected to testify concerning the Estate’s inventory and maintenance of Estate assets, including the inventory of C.C. Wang’s seals. Mr. Opell is further expected to testify concerning the lack of existence of Estate-held documents or records of an individual named “Er Shi Fu” or “Raymond Ye.” Mr. Opell is further expected to testify concerning representations that were made by Andrew Wang and S.K. Wang’s legal counsel, Carolyn Shields, regarding the Estate sales of paintings. Mr. Opell is also expected to testify as to the existence of records or lack thereof maintained by the New York County Public Administrator’s office. Mr. Opell is also expected to authenticate certain records as needed.

Elin O’Toole Ewald of O’Toole-Ewald Art Associates (Live) – Elin O’Toole Ewald is expected to testify concerning her and her company’s role in inventorying Estate paintings and reviewing their proposed sale prices between 2005 and 2009. Ms. Ewald is also expected to authenticate certain records as needed.

Yien-Koo King (Live) – Yien-Koo King is expected to testify concerning S.K. Wang’s knowledge and role in managing C.C. Wang’s classical paintings collections prior to his death. She is expected to testify concerning her disinheritance from C.C. Wang’s Estate based upon a fraudulent will propounded for probate in July 2003 by S.K. Wang and Andrew Wang. She is expected to testify concerning her turnover of approximately 80 Estate paintings to the Public Administrator and Martin Klein in or about January 2004. She is expected to testify concerning her attendance at the November 2009 Bao Wu Tang exhibition at the Beijing Capital Museum and her efforts to acquire information related to the paintings displayed at the 2009 Bao Wu Tang exhibition and paintings sold by the Estate. If permitted, she may also testify concerning her attempt to settle her disinheritance and other disputes with Andrew Wang in May 2005 at a settlement exchange in Shanghai. She is expected to testify concerning her commencement of this action on behalf of the Estate.

Peter Schram (Live or by Deposition) – Peter Schram is expected to testify regarding his representation of the Public Administrator of New York County in her capacity of Estate fiduciary between 2003 and 2009.

Martin Klein (Live) – Martin Klein is expected to testify concerning his involvement in the sale of Estate paintings and his communications with Andrew Wang and Peter Schram regarding the same. Mr. Klein is also expected to testify concerning Andrew Wang’s collection of Estate assets, including C.C. Wang’s seals. Mr. Klein is also expected to authenticate certain records as needed.

Hilton Soniker (Live) – Mr. Hilton Soniker is expected to testify concerning emails received by Andrew Wang concerning the collection of Estate property, including the Estate Chinese seals, and concerning the coordination of the sales at issue.

Carolyn Shields (Live) – Carolyn Shields is expected to testify concerning certain representations she made to counsel for the Public Administrator and Y.K. King on behalf of Andrew Wang concerning his relationship with the five purported buyers and “Raymond Ye.” Ms. Shields is further expected to testify concerning the verified answer to a petition to remove Andrew Wang as Estate fiduciary, filed and verified by Shou-Kung Wang on or about August 28, 2014. Ms. Shields is also expected to authenticate certain records as needed.

Shou-Kung Wang (Live and through deposition, with interpreter if necessary)—Shou-Kung Wang is expected to testify concerning his relationship with C.C. Wang and his role in managing C.C. Wang's paintings collection and assets prior to this death. Mr. Wang is expected to testify concerning his relationship with Y.K. King and his collection of approximately 60 Estate paintings from her in March and April 2003. Mr. Wang is expected to testify concerning paintings sales and certain financial transactions.

Rong Luo (Live, with interpreter if necessary) — Rong Luo is Andrew Wang's wife. If permitted notwithstanding the Court's in limine orders, Ms. Luo is expected to testify concerning the source of payments for certain multi-million-dollar real estate purchases she and Andrew Wang made between 2009 and 2019. She is further expected to testify concerning certain multi-million-dollar transfers between herself and A. Wang. She is further expected to testify concerning her knowledge of Andrew Wang's art collection and business activities. Ms. Luo is also expected to authenticate certain records as needed.

Jay Lau (Live) — If permitted notwithstanding the Court's in limine orders, Jay Lau will testify he is Andrew Wang's former real estate attorney who produced records related to Le Tao Limited and the Shou-Kung Wang Irrevocable Trust's purchase of a \$5.9 million property on Long Island in 2013. Mr. Lau is expected to testify concerning his knowledge of Mr. Andrew Wang and Shou-Kung Wang's transactions. Mr. Lau is also expected to authenticate certain records as needed.

Patrick Regan (Live) — Patrick Regan is expected to testify concerning the topics identified in his Fed. R. Civ. P. 26 reports. These include the value of the 98 Estate Paintings at issue in the action (if permitted notwithstanding the Court's in limine order), their auction, and the addition of C.C. Wang's seals on many of the paintings at some point after their sale.

Yi Lin (Live) — If permitted notwithstanding the Court's in limine orders, Yi Lin will testify she is Andrew Wang's former real estate attorney who produced records related to the Jie Wang Revocable Trust's purchase of property, using checks from Andrew Wang's personal bank account. Mr. Yi Lin is expected to authenticate the documents he produced.

Eric Vardi (Live) — If permitted notwithstanding the Court's in limine orders, Eric Vardi will testify that he is Andrew Wang's former real estate attorney who produced records related to Andrew Wang and Rong Luo's purchase of a \$920,000 parcel of property in New York State in or about 2017. Mr. Vardi is expected to authenticate the records he produced.

Wei Zheng (Live or by Deposition) — Wei Zheng was a purported purchaser of Estate paintings in February 2003 according to records maintained by the New York County Public Administrator's office. Mr. Zheng is expected to testify concerning his execution of documents identifying him as the buyer of Estate artwork.

David Rose (Live) — David Rose is an attorney for the Plaintiff who is expected to testify as to the year which Yien-Koo King received he six sales contracts from the Estate of Chi-Chuan Wang if the statute of limitations defense is raised by the Wangs.

The Plaintiff reserves the right to call the following witnesses in relation to accusations of theft, fraud, or misappropriation of artwork by Kenneth King, Raymond King, or Yien-Koo King or in relation to a claim by the Defendants that the February 18, 2003 will submitted by them was not the product of fraud or undue influence at a time when C.C. Wang lacked testamentary capacity:

Raymond Martin (by Deposition) – Financial advisor to C.C. Wang who would testify to the relationships and dealings between C.C. Wang, Yien-Koo King, and Kenneth King between 1998 and 2002.

Deneen King - Live or by prior trial testimony) – Daughter-in-law of C.C. Wang to testify regarding C.C. Wang's mental health in 2003.

Jeff Zankel⁵ (Live or by prior trial testimony) – Estate lawyer for Chi-Chuan Wang who would be expected to testify as to the preparation of wills, codicils, and trusts between 1998 and 2002.

Diane Ducat (Live) – A student of Yien Koo King's and will testify as to Yien Koo King's presence at class in contradiction to time alleged to be with CC Wang.

Annette L. Juliano⁶ (Live) – A longtime friend of the family and produced a catalogue of CC Wang's bronze collection. She is Dean of the Brooklyn College Art Department, and will testify as to the relationship of Yien Koo King with CC Wang and the family.

Parong Chao (Live or by Deposition) —Expected to testify as to relationship & activities with CC Wang, Yien Koo King, Kenneth King, Shou Kung Wang, and Andrew Wang.

Dr. James Tcheng⁷ (Live or by prior trial testimony) – Grandson of C.C. Wang and nephew to Yien Koo King and S.K. Wang. Testify as to mental condition of CC Wang throughout many interactions over period of several years, including late 2003.

Dr. Robert Goldstein (by prior trial testimony) – forensic psychologist who examined the medical records of C.C. Wang and testified that in his opinion C.C. Wang suffered from Alzheimer's disease or another form of dementia.

Defendants' Trial Witnesses

Andrew Wang (Live, with interpreter):

Mr. Wang is expected to testify that Plaintiff's allegations are false, and that the Estate's art sales were to third party buyers at values he believed to be fair at the time of the sale, subject to the review of the Public Administrator's independent appraiser and the approval of the Public Administrator. Mr. Wang will also address the other allegations against him to the extent that they are included in the trial.

⁵ Mr. Zankel and Dr. Goldstein are within the jurisdiction. Defendants object to their testimony being provided other than live.

⁶ Ms. Ducat and Ms. Juliano have never previously been identified as having relevant information in any of the discovery or disclosures in this litigation or any prior litigation. As such, Defendants object to their use as witnesses at trial. Plaintiff responds that is because the re-litigation of the 2003 Probate Contest was not previously contemplated and they are rebuttal witnesses.

⁷ Dr. Tcheng was never designated as an expert or disclosed as a non-retained expert; Defendants would object to his providing expert testimony.

Shou-Kung Wang (Live, with interpreter):

Mr. Wang is expected to testify that Plaintiff's allegations with respect to his participation in the alleged scheme is false, and that he had nothing at all to do with the sales or purchases at issue. Mr. Wang will also address the other allegations against him to the extent that they are included in the trial.

Elin Ewald (Live):

Ms. Ewald is expected to testify regarding the process by which she rendered opinions on the proposed Estate sales, the manner in which the Estate determined the prices at which it would offer the paintings at issue for sale, the Public Administrator's reliance on her opinions and her opinions with respect to the prices at issue and eventual sales.

Wei Zheng (Live, with interpreter):

Mr. Wei is expected to testify with respect to his efforts to facilitate a sale by the Estate to a third-party buyer.

John Wang (By deposition):

Mr. Wang testified with respect to his background, creation of a record of C.C. Wang's seals, to issues relating to the authentication of art and seals, and to issues with respect to the authenticity of art in the collections of C.C. Wang and Zhang DaQian.

Arnold Chang (Live):

Mr. Chang is expected to testify about his background, his relationships with the Wang family parties, his prior work for Plaintiff (in her individual capacity), and the 2004 Sotheby's Appraisal and its uses.

Mee-Seen Loong (Live):

Ms. Loong is expected to testify regarding her background, relationship with the Wang family parties, her participation in the 2004 Sotheby's appraisal, and the 2006 Sotheby's auction of paintings from C.C. Wang's Estate.

Alfreda Murck (Live):

Professor Murck is expected to testify about authenticity issues with respect to C.C. Wang's collection, the exhibition practices of Chinese museums, and her interactions with Plaintiff.

Peter Schram (Live, if called by Plaintiff; otherwise by deposition):

Mr. Schram is expected to testify regarding the Estate's efforts to marshal and sell assets.

Kenneth Linsner (Live)

Mr. Linsner is expected to testify regarding the subject matter of his expert reports.

Yien-Koo King (Live and by deposition)

To the extent that the issues relating to the probate are not excluded, Ms. King is expected to testify about C.C. Wang's mental status and the Kings' thefts of art.

Raymond King (By deposition)

Mr. King testified as to C.C. Wang's mental status in the last months of his life, if relevant, and the Kings' concealment of relevant information relating to the statute of limitations.

Anne Elizabeth Tilley (Live)⁸

Ms. Tilley is expected to testify as to her and her colleagues' assessment of C.C. Wang's competence to make medical decisions in March 2003.

Kenneth King (By deposition)⁹

Mr. King testified as to C.C. Wang's mental status and the Kings' thefts of art, if relevant, as well as to Soon Huat's purchases of art from C.C. Wang.

Joseph Erlichster (Live via Zoom if available, otherwise by deposition)

Mr. Erlichster is expected to testify as to C.C. Wang's competence and testamentary intent in 2003 and upon the revocation of his revocable trust, if relevant

Jerome Kamerman (By deposition)

Mr. Kamerman testified about the execution of the 2003 Will, and his practice and experience as an attorney.

Dr. David Cancel (Live)¹⁰

Dr. Cancel is expected to testify as to C.C. Wang's competence and testamentary intent in 2003, if relevant

⁸ The Plaintiff objects to calling Anne Tilly as a witness because she is not identified in Defendants' Rule 26(a) disclosures. With respect to each objection to witnesses not listed on Defendants' Rule 26(a) disclosures, Defendants respond (1) the disclosure referenced any other individuals identified in discovery as having relevant information, and (2) Defendants had previously identified to Plaintiff these individuals as having relevant information in the course of their 17 years of litigation relating to the issues to which their testimonies is relevant. The parties are ready to address this issue at the pre-trial conference.

⁹ The Plaintiff objects to calling Kenneth King as a witness because he is not identified in Defendants' Rule 26(a) disclosures. Mr. King was deposed in the Wangs' now-dismissed RICO action. He is not listed as a witness with respect to the current case and the Plaintiff would have approached its strategic focus during discovery differently if he was named as a witness in this, non-dismissed, action.

¹⁰ The Plaintiff objects to calling David Cancel as witness because she is not identified in Defendants' Rule 26(a) disclosures.

Jose Dominguez (By deposition)

Mr. Dominguez testified as to C.C. Wang's visits to the North Fork Bank vault in 2003, if relevant

Preciosa Roque (Live)¹¹

Preciosa Roque is expected to testify as to C.C. Wang's mental status as of the revocation of the revocable trust, if relevant

Chona Luz Sianson-Lippert (Live)¹²

China Luz Sianson-Lippert is expected to testify as to C.C. Wang's mental status as of the revocation of the revocable trust, if relevant.

Chao Pao Yung (By deposition)¹³

Chao Pao Yung testified as to C.C. Wang's mental status in February 2003, if relevant.

James Soong (By deposition)

James Soong testified as to C.C. Wang's mental status from late 2002 through the end of his life, his discovery of Yien-Koo King's theft of Northwich, and the reintroduction of S.K. Wang into C.C. Wang's business affairs.

Chien Fang Huang (By prior trial testimony)

Chien Fang Huang testified as to C.C. Wang's mental status at the end of his life, if relevant.

H. Deposition Designations¹⁴

1. Plaintiff's Deposition Designations

*	Designation ¹⁵	Objection	Counter Designation	Objection
Andrew	6:12-8:22		8:23-9:5	401
Wang	9:17-19			

¹¹ The Plaintiff objects to calling Preciosa Roque because she is not identified in Defendants' Rule 26(a) disclosures.

¹² The Plaintiff objects to calling Chona Luz Sianson-Lippert as a witness because she is not identified in Defendants' Rule 26(a) disclosures.

¹³ The Plaintiff objects to calling Chao Pao Yung as a witness because he is not identified in Defendants' Rule 26(a) disclosures.

¹⁴ These designations assume the current scope of the trial. Because a large number of designations would be deleted upon the execution of the contemplated stipulation, Plaintiff has not reviewed and objected/counterdesignated with respect to a number of Defendants' recent designations as a result of the expected limitation. The parties stipulate to the Plaintiff's ability to supplement this Joint Pretrial Order with objections and counter-designations for potentially unnecessary testimony once there is clarity on this point. Defendants also reserve the right to add objections to Plaintiff's counter-designations.

¹⁵ All designations exclude internal attorney colloquy objections.

December 10, 2013	10:24-11:6		10:3-19	*
	17:2-17:24			
	36:14-38:23		38:24-39:6	*
	39:7-19		39:20-40:7	*
	50:10-56:15		43:3-47:8, 47:24:50:9, 56:16-58:2, 58:10-59:22	403 (as to 56:16-58:2 and 58:10-59:22) re claims of misconduct by Kings
	60:3-63:6		63:12-23	*
	64:19-65:7			
	67:14-68:10		71:7-75:3	403 as to plot by the Kings; 602; 802
	76:7-83:11		83:12-24, 85:6-87:11	403; 602
	93:2-18		91:23-92:2, 92:3-25	403 for 91:23 (No answer with knowledge); 403
	94:22-95:8		95:23-96:14	403
	97:14-99:4		96:21-97:13, 99:5-19	403 for first cite.
	101:17-102:7		101:8-16, 102:8-103:23	802; 602
	104:23-105:6		105:7-106:3	802; 602
	133:23-134:2		134:3-20	*
	134:21-136:9			
	138:4-18			
	139:15-140:4			
	140:18-141:6		141:7-17	802; 602
	141:18-142:14			
	150:8-21			
	152:5-24		158:20-159:6	802; 602
	162:7-9		162:10-163:3	802; 602
	163:4-11			
	166:19-168:25			
	171:20-24			
	172:4-7		172:8-17	602; 802
	172:18-20		172:21-173:2	602; 802
	173:12-6			
	194:22-195:6	195:2-6 FRE 602		
	195:20-196:5		195:7-19, 196:6-12	602; 802
	197:16-198:5	198:3-5 FRE 602	198:6-17	602; 802
	199:11-16			

	201:2-202:21	201:2-202:21: FRE 401, 403, 408		
	209:5-212:12	209:6-210:2: FRE 401, 403, 408		
	223:10-225:23			
	249:13-22			
	253:5-254:4	401, 602		
	256:6-257:12	401 (256:6-10) 401, 602	262:16- 263:8, 263:16-24, 264:15-22, 265:24- 266:13	602; 802; 403 (on allegations against Kings)
	268:6-19		269:11- 270:10	602; 802
	281:18-282:8		285:21- 286:10	*
	326:15-333:17		326:15- 327:24	*
	340:15-343:11, (343:16-25).	401, 403	343:12-15, 344:2	602; 802 (no question and answer cited in part 2)
	344:16-346:19	401, 403	346:21-25	602; 802
	349:21-350:25	401		
	351:13-357:18	401	354:22-25, 357:25-358:9	Must include question.
	360:3-18	401, 403		
	378:21-381:15			
	472:11-473:12		450:8- 451:18, 452:3-7, 458:6-24,	*
	(462:5-24)	401, 403	461:20- 462:4, 464:24- 463:18	Do not understand cites.
	476:7-19			
	477:5-16			
	478:2-481:9			
	481:12-17		481:10-17	*
	488:25-491:19			
	494:25-499:7	401, 403, 408	496:14- 497:25	*

	504:3-505:2		503:12-22	*
	505:18-507:14			
Andrew Wang Decemb er 17, 2013	521:14-522:6			
	522:25-523:13	401, 403, 408	523:14- 524:5, 525:14-21	*
	525:14-21			
	528:14-529:2			
	534:2-19			
	543:19-545:19		545:20-546:9	602; 802
	547:7-551:16 (551:22-553:5)	401, 403, 408		
	577:11-578:12			
	578:23-579:16			
	595:13-596:16	401, 403, 408	596:4-16	*
	596:25-598:12	401	598:13-20	602
	599:15-600:8	401		
	616:5-18			
	617:21-618:12		616:5-14, 618:13-19	*
	654:8-655:3		653:5-654:7	602; 702 (legal conclusion)
	657:18-21			
	677:9-15	401	677:16-678:6	*
	704:6-705:14		703:25- 704:25, 705:8-14	*
	707:9-708:16			
	708:22-709:11			
	722:10-17		722:18- 723:24	*
	725:3-14		724:6-22	*
	725:15-19			
	725:20-726:12			
	727:21-24			
	727:25-729:14		729:15-17	*
	730:25-731:8		731:9-18	*
	732:15-22			
	733:13-736:14	Colloquy, 401		
	739:13-741:15			
	746:2-14			
	752:24-754:7			
	760:7-16		760:17-20	*
	760:21-761:6			

Andrew Wang December 19, 2013	837:11-16	Vague – which painting?	837:21-838:5	702; 602; 802
	858:18-860:10			
	938:14-939:20	401 as to the colloquy. Vague as to the remainder.		
	940:9-18	401		
	941:6-943:11			
	943:12-944:13			
	944:14-945:5			
	945:6-947:7			
	948:2-949:2			
	949:3-17			
	949:18-950:16			
	952:15-953:22			
	953:23-954:6			
	956:5-957:9			
	957:10-958:5			
	958:13-959:16			
	960:3-961:11			
	961:12-961:24			
	980:6-21	401, vague		
	982:13-16	401		
Andrew Wang June 25, 2019	5:9-6:6			
	6:7-7:24	FRE 401, 403		
	8:16-9:18	FRE 401, 403		
	10:8-16	FRE 401, 403	10:17-25	*
	11:2-19	FRE 401, 403	11:20 to 12:5	*
	13:4-12	FRE 401, 403		
	13:19-17:19		17:20 to 18:3	*
	18:4-19:11			
	19:12-20:5			
	20:6-21:16			
	22:2-23:10			
	23:13-24:11	FRE 401, 403		
	24:19-22	FRE 401, 403		
	25:10-27:12		27:13 to 28:18	*
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59:23-61:3		61:4-20	*
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65:4-67:19		67:25 to 68:6	*
70:13-71:16		71:19-24	*
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75:9-76:5			
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80:8-81:6		Correct “appeals” to “Appel’s”	
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117- 1-13	117:11-13 – Colloquy		
118-1-6			
118-16-23			
119-2- 122-22		124:11-25	Vague. Use Entire question and answer.
126-16- 128-17		125:17 to 126:3	*
130-14- 132-9			
139-23- 140-8		140:9 to 141:21	* If corrected
143-21- 144-3		143:2-17	Objection to translation
144-22- 145-14			
145-21- 146-14		145:19-20	*
146-23- 147-14	FRE 401, 403	146:15-20	*
149-19-150-25			
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154-23-25	FRE 401		
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169-14- 170-20		170:21 to 171:4	*
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247-6- 248-11			

	254-16-256-18		268:21 to 269:24; 270:- 21 to 271:4	401 (not related topics)
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	317-20-318-12			
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	39:3-43:15		
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	57:6-58:21		
	63:5-65:3		
	68:6-69:10		
	70:10-19		
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	11:6-12:9		10:23-11:5 *
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¹⁶ These privilege objections were addressed with the Court in the deposition and then resolved by agreement of the parties

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92:24-95:2			
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100:7-23		100:2-6	*
101:5-8			
101:14-7			
102:14-103:21		102:8-13	*
104:5-16			
105:2-107:9			
108:19-111:5			
111:12-112:14			
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126:11-127:13			
127:22-129:7			
129:19-130:8			
130:17-131:9			
131:22-133:13			
134:8-135:24	401 ¹⁷		
136:7-10		135:25-136:6	401
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152:17-153:11			
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¹⁷ The only evidence here (lines 8-19) is the testimony embedded in the question

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	169:10-171:23		
	172:4-7		
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	173:5-175:25	176:2-4	802; 401
	176:14-18	176:10-13	* If question is included.
	176:24-177:11		
	177:18-180:2		
	181:14-184:14		
	187:23-188:8		
	188:15-189:15		
	190:23-191:14		
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28:8-12			
29:3-31:6	401		
31:19-32:13			
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54:19-25	401		
65:23-67:22	401		
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68:21- 69:9(Covered by 68:7-69:21)	401		
69:18- 21(Covered by 68:7-69:21)	401		
70:12-72:25	401		
73:14-75:24	401		

74:17-19 (Covered by 73:14-75:24)	401		
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76:13-15 (Covered by 77:6-78:14)	401	76:4-12, 76:17-18	*
77:6-78:14	401		
78:4-14 (Covered by 77:6-78:14)	401		
78:15-79:11			
79:12-19	401	79:6-11	* if full Q&A read
80:3-83:13	401		
84:24-87:13	401		
88-14-23		90:6-12	*
96-11- 97:18			
97:19-23	401		
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105:15- 108:5	401		
108:19-109:4	401		
109:5-12	401		
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116:16-23		113:19-20, 114:7-14	403
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123:18-24		123:12-17	*
124:12-20	401		

125:6-127:20	401 (125:6), 602 (127:12- 20), 702		
128:25-131:11			
133:4- 134:14	401		
136:8- 137:2		135:9-136:7	*
137:4-10		137:4-18	
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143:13-144:21	401		
139:18-24 (Covered by 139:3- 143:5)	401		
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164:11- 165:24			
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169:14-172:12			
172:18- 173:15			
174:11- 176:2			
177:8- 178:11		176:23-177:7	*
178-24- 179:4			
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	33:13-16			
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	51:6-22			
	54:15-55:6			
	55:19-56:6		55:14-17, 55:24-25, 56:5-15	*
	57:14-59:7			
	64:7-24		63:25-64:6	*
	66:21-68:20			
	75:9-20			
	76:5-19			
	77:20-78:10		78:11-79:6	802; 403
	80:17-83:24	401	84:6-7	* if full Q&A
	84:10-13			
	90:17-93:8			
	93:14-96:14		96:15-97:12	*
	98:5-18	401		
	101:9-102:18		100:20-101:5	*
	108:24-109:18	401		
	110:11-23	401		
	112:22-114:22	401		
	115:15-24	401		
	116:16-117:11	401		
	119:2-120:23	401	119:2-3 , 120:16- 121:23	802; 602; 403
	127:7-128:17	401	126:2-22	*
	129:14-21	401		
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	4:22-7:25	401		
	8:13-9:12			
	11:16-12:6			
	42:12-43:6	401		
	43:11-19		44:7-19, 45:4-8	*
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	47:13-18	47:22-48:4, 48:25-49:8, 49:22-50:3, 50:17-23, 51:14-18, 51:24-52:4, 52:12-23	No objection if 52:22-23 hanging question omitted.
	53:17-23	53:24-54:7, 54:11-12, 55:4-5, 55:13-24, 56:9-57:4 58:16-59:20, 61:15-25	*
	66:14-16	66:5-7, 66:10-11, 66:17-67:9, 67:15-68:22	*
71:20-25	401		
73:4-6	401		
75:2-6		75:9-76:7	
75:15-18			
76:8-77:13			
78:3-12		77:25-78:2	*No objection if answer on 78:3 is included
83:25-84:20			
84:25-87:5	401		
88:6-92:23	401, 403 (92:17-23) ¹⁸		
93:22-94:10			
95:6-19		96:3-5	* No objection if combined with the answer in 97:2-8
97:9-99:21		97:2-8	
104:4-12	401		
104:23-107:25	401		
108:12-110:5			
110:21-111:21	401	111:22-25	*
112:9-20	401		
116:2-23	401		
120:15-25	401, Questions of counsel without		

¹⁸ Unanswered question.

		answer by the witness ¹⁹		
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160:24-161:14		161:23-162:5	*	
162:14-18				
163:8-12		167:25-168:22	*No objection if answer included	
169:7-170:9				
170:20-171:17		171:18-21	Hanging question with no answer	
174:2-14				
175:9-25				
178:23-179:20				
181:20-182:14		182:15-23	*	
184:6-185:25				
186:15-187:22		186:6-8	Hanging answer with no question	
188:3-190:18		187:22-188:2	*	
191:2-21				
193:15-194:18		194:19-22	*	
194:23-197:10		197:11-14, 197:22-25, 198:11-199:24	*	
201:13-20	401	201:21	*	
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203:24-205:22	401	205:2-3	*	
206:8-15		206:16-207:7	*	
207:22-208:8		207:17-21	602	
212:22-214:7		211:3-18, 211:22-212:21	* 211:22 is a hanging answer.	
216:15-22		218:6-13	*	
219:22-220:12				
220:22-221:2		220:13-21	*	
221:6-14		221:3-5, 221:15-21, 222:17-25	*	
224:10-16				
225:21-226:2				
227:20-228:2		228:3-12	*	

¹⁹ The questions were objected to, the witness was instructed not to answer, and the Surrogates' Court addressed those objections on the record.

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241:16-18		241:12-15, 241:19-242:3	401
243:3-5			
243:21-244:4		244:14-20	602; 802
245:18-21			
246:2-247:21			
248:12-249:13			
249:17-251:2			
252:6-253:11		253:12-14	*
255:6-9		255:10-17	*
256:17-257:17		257:25-258:2	Hanging answer.
258:18-24		258:11-17	*
259:15-261:15			
263:3-23		262:17- 263:2, 263:24- 265:6, 265:10-266:3	403; 602; 802
266:13-267:19			
269:6-9			
269:19-270:10			
270:18-271:6		271:7-12	*
271:13-272:11			
273:10-22		272:22-273:9	*
274:3-25		275:2-21	*
		283:8-17	602; 802; 403
		284:21-285:4	*
		289:24-290:3	*
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326:14-329:10		329:11-19	*
332:15-333:2		330:19- 331:19, 332:8-14, 333:3-11	*
333:17-334:11			
335:22-336:3		336:13-24	*
		340:10-17	*

2. Defendants' Deposition Designations²⁰

Witness	Designation	Objection?	Counter Designation?	Objection?
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	10:25-11:14			
	12:3-15			
	13:4-16:11			
	16:19-17:8			
	18:5-19:6			
	19:15-20:8			
	20:20-33:19			
	34:2-36:2			
	36:17-38:15			
	39:2-41:11			
	41:17-44:8			
	44:25-45:9			
	48:7-21			
	50:4-15			
	53:5-12			
	55:18-56:20			
	57:2-59:17			
	60:12-61:8			
	61:24-62:5			
	64:3-18			
	65:6-18			
	66:2-67:20			
	68:2-13			
	68:20-69:22			
	71:17-23			
	72:3-7			
	72:11-15			
	74:7-75:10			
	75:14-24			
	77:3-78:24			
	81:18-82:13			
	82:17-25			
	86:10-89:2			
	92:9-93:13			
Joe Erlichster Day 1	8:4-10:1			
	10:13-25			
	11:22-12:19			
	12:22-13:8			

²⁰ All designations exclude internal attorney colloquy.

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	20:18-21:10			
	21:23-22:15			
	23:4-23			
	24:22-27:17			
	30:16-31:1			
	32:21-33:25			
	34:19-37:18			
	38:19-41:5			
	41:23-44:22			
	45:5-11			
	47:4-6			
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	47:21-48:2			
	48:21-49:5			
	49:10-51:13			
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	59:1-60:2			
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	65:14-66:24			
	67:6-68:21			
	69:1-71:2			
Joe Erlichster Day 2	93:4-94:11			
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	103:12-105:10			
	105:19-107:21			
	108:19-114:10			
	117:9-119:11			
	119:16-120:23			
	121:16-122:13			
	129:15-131:15			
	134:4-135:23			
	139:6-21			
	143:15-144:21			
	145:3-15			
	146:17-147:16			
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Jerome Kamerman	5:15-7:11			
	7:18-8:4			
	8:21-11:24			
	12:7-15:16			
	15:23-18:19			
	19:5-21:2			
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	25:6-32:8			
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	36:13-37:3			
	38:2-39:3			
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	54:5-8			
	56:5-57:4			
	67:22-68:5			
	68:9-16			
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	90:10-15			
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	93:25-94:10			
	97:9-22			
	97:25-98:12			
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	122:13-21			
	123:13-124:23			
	125:10-126:19			
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	130:14-134:10			
	134:15-136:23			
	137:10-138:9			
	141:17-142:13			
	142:17-143:2			
	143:15-23			
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	22:24-27:3			
	64:8-65:7			
	70:2-6			
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	41:10-24	*	37:15-39:7 40:11-41:9 41:24-42:25 43:11-45:25	
	43:2-10	*	37:15-39:7	

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	61:7-62:4	*	93:3-14; 97:4-98:10	
	96:6-22	401; 403	212:5-213:2	
	211:23-212:2	401; 403	212:5-213:2	
	213:3-214:19	401; 403	212:5-213:2	
	214:22-215:11	401; 403	215:20-216:11	
	222:24-223:5	401; 403	223:6-10	
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²¹ Peter Schram is expected to testify live. The Parties stipulate that the Plaintiff will have the opportunity to respond to the extent he testifies by deposition.

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FRCP32(a)(6) Designations to be used in the Defendant's case in chief to the extent Plaintiff offers testimony from these depositions are listed below. Because Plaintiff would only use FRCP32(a)(6) Designations on rebuttal, it does not include them at this time in accordance with Rule 5(a)(x) of the Court's Individual Practices.

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	210:16-25		
	212:14-213:8		
	220:6-223:7		
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	230:7-232:6		
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	236:23-237:2		
	238:8-239:7		
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	251:9-253:2		
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	254:3-254:15		
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	306:9-308:2		
	311:13-312:2		
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	318:25-319:18		
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I. Exhibits²²

1. Plaintiff's Exhibits²³

PLAINTIFF EXHIBIT NO.	DESCRIPTION	OBJECTIONS	ADVANCE RULING REQUESTED
PX-1	Undated – Large Handwritten List of CC Wang Paintings in SK's Handwriting.	FRE 401, 403	
PX-2	Undated – Handwritten List of Works to be Given by SK to YK [KK83].	FRE 401, 403, 408	
PX-3	Undated – Alan Apell Inventory/Bryan Cave List.	No Objection	
PX-4	Undated – Estate Tax Chart.	FRE 106	

²² The parties' contemplated stipulation would require the deletion of a number of the identified exhibits and the parties will update the Court accordingly if a stipulation is reached. Exhibits coded in red are exhibits likely to be excluded if the parties are able to reach a limitation on the scope of the trial.

²³ Plaintiff has taken an inclusive approach to its exhibit list given the size of this case. It reserves the right to object to the admissibility of any document contained on its list if not offered by Plaintiff or used for the same purpose as Plaintiff intended. Plaintiff has requested the Defendants not rely on items identified on the Plaintiff's list, but to include items they wish to use on their own exhibit list so that objections may be preserved by both sides. Defendants reserve the right introduce any document offered on Plaintiff's exhibit list if not offered by Plaintiff.

PX-5	Undated – Inventory of CC Wang Seals Turned Over to the Estate in 2003.	FRE 901	
PX-6	Undated – Photographs of Estate Classical Paintings Inventory Taken by OTE between 2003 and 2004.	No Objections	
PX-7	February 21, 1997 – CC Wang Revocable Trust.	FRE 401, 403	
PX-8	Undated – Inventory of C.C. Wang Seals as of 2001.	No Objection	
PX-9	June 8, 2001 – John S. Wang and C.C. Wang Photographs.	FRE 401	
PX-10	March 24, 2003 – List of Chinese Paintings.	FRE 401, 403, 901	
PX-11	March 29, 2003 – List of Art Returned to SK.	FRE 401, 403	
PX-12	April 15, 2003 – List of Art Returned to SK.	FRE 401, 403	
PX-13	May 16, 2003 – Art Returned to SK.	FRE 401, 403	
PX-14	May 21, 2003 – Alleged CC Revocation of Kings' Power of Attorney for CC and Appointment of SK.	FRE 401, 403	
PX-15	July 1, 2003 – CC Trust Revocation Letter with handwriting by SK.	FRE 401, 403, 901	
PX-16	September 19, 2003 – List of Paintings Faxed by AW to Hilton Soniker.	FRE 401, 403, 801, 901 (as to handwriting)	
PX-17	October 21, 2003 – Letter from Klein to Schram. Letter regarding AW's collection of CC Wang's seals.	No Objection	
PX-18	October 22, 2003 – Letter from Schram to John Gallagher, Esq. Letter concerns AW's collection of seals.	FRE 801	
PX-19*	January 5, 2004 – Linsner Initial Appraisal for Estate.	No Objection	
PX-20*	January 8 and 9, 2004 – Photographs of Approximately 80 Paintings Delivered by YK to Estate in or about January 2004.	No Objection	
PX-21*	February 3, 2004 – Klein Letter and Copies of Crozier Receipts.	No Objection	
PX-22	February 9, 2004 – OTE Letter to PA.	FRE 801	

PX-23	February 20, 2004 – 20-Page OTE Estate Classical Paintings Inventory List.	FRE 801	
PX-24	June 17, 2004 – Sotheby's Appraisal Agreement.	FRE401, 403 in light of PX 27	
PX-25	August 12, 2004 – Klein Fax to Schram with Partially Signed Copy of Appraisal Agreement for Chinese Works.	FRE401, 403 in light of PX 27	
PX-26	August 19, 2004 – Klein Fax to Sotheby's with Signed Copy of Appraisal Agreement for Chinese Works.	No Objection	
PX-27	September 16, 2004 – Sotheby's Appraisal of Estate Contemporary Fine Art.	FRE 401	
PX-28	September 20, 2004 – AW Email to Mee-Seen Loong re Sotheby's Appraisal Values.	No Objection	
PX-29	September 16 and 28, 2004 – Sotheby's Letter with Sotheby's Appraisal of C.C. Wang Created Artwork.	FRE 401	
PX-30*	October 1, 2004 – Sotheby's 2004 Appraisal of Estate Chinese Classical Paintings.	No Objection	
PX-31*	October 3, 2004 – Mee-Seen Loong Email to AW re Appraisal.	No Objection	
PX-32	October 3, 2004 – AW Email to Mee-Seen Loong.	FRE 401, 403 in light of PX 31	
PX-33	January 18, 2005 – List of Chinese Paintings in SK's Handwriting.	FRE 901	
PX-34*	April 4, 2005 – AW Email to Klein.	No Objection	
PX-35	January 2003 and July 2003 – Charles Schwab Statements for CC Wang Revocable Trust Account.	FRE 401, 403	
PX-36*	September 26, 2006 – Klein/AW Email Exchange Concerning IRS Requests.	No Objection	
PX-37	September 26, 2006 – Email Between AW and Klein.	FRE401, 403 in light of PX 36	
PX-38	October 31, 2006 – Estate Letters to IRS with Attachments.	FRE 401, 403, 801, with respect to WANG002833-2901	

PX-39*	February 16, 2007 – IRS Memorandum to CC Wang Estate.	No Objection	
PX-40	March 30, 2008 – List of Chinese Paintings with SK's Handwriting.	FRE 401, 403, 801, 901	
PX-41	February 14, 2020 – PA Declaration on Summary Judgment in <i>King v. Wang et al</i> , 14-cv-07694.	FRE 801	
PX-42	May 2001 – “Seals Record of C.C. Wang” Created by John S. Wang.	No Objection	
PX-43	February 10, 2003 – Purported Codicil of C.C. Wang	FRE 401, 403	
PX-44	February 18, 2003 – Purported Will of C.C. Wang	FRE 401, 403	
PX-45*	Undated – Estate Schedule D-80 Tax Forms Reporting Painting Sales.	No Objection	
PX-46*	Undated – Estate ET-706 Tax Form.	No Objection	
PX-47*	February 16, 2005 – Estate Wire Transfer Record – North Fork Bank – Wei Zheng.	No Objection	
PX-48*	April 22, 2005 – Estate Wire Transfer Record – North Fork Bank – Chen Mei Lin.	No Objection	
PX-49*	May 27, 2005 – Klein Email re Tax Amounts Still Owed by Estate.	No Objection	
PX-50*	June 16, 2005 – Estate Wire Transfer Record – North Fork Bank – Anthony Chou.	No Objection	
PX-51*	September 21, 2005 – Estate Wire Transfer Record – North Fork Bank – Yong Qing Ye 1.	No Objection	
PX-52*	February 16, 2006 – Estate Wire Transfer Record – North Fork Bank – Yong Qing Ye 2.	No Objection	
PX-53*	February 13, 2007 – IRS Memorandum re Estate Appraisal Review.	No Objection	
PX-54*	August 8, 2007 – Klein Fax with Estate Tax Return.	No Objection	
PX-55*	August 12, 2009 – Estate Wire Transfer Record – Capital One Bank - Yue Da Jin.	No Objection	

PX-56	2005-2009 – Collection of All Estate Sale Private Sale Wire Records.	Duplicative of Prior Exhibits	
PX-57	October 7, 2004 – AW Email to Klein re Tax Payments.		
PX-58	December 6, 2004 – AW Email to Klein re Private Buyers.		
PX-59*	December 15, 2004 – 12:36 pm – AW/Klein Emails re Art Pricing.		
PX-60*	December 15, 2004 – 3:47 pm – AW/Klein Emails re Art Pricing.		
PX-61*	December 20, 2004 – 2:49 pm – AW Email re Potential Sale Adjustments.		
PX-62*	December 20, 2004 – 4:10 pm – AW Email re Potential Sale and Discounts.		
PX-63*	December 20, 2004 – 7:02 pm – AW Email re Proposed Sales.		
PX-64*	December 22, 2004 – 11:24 am – AW Email re Sale of Paintings.		
PX-65*	December 22, 2004 – 4:22 pm – AW Email re OTE 223.		
PX-66*	January 6, 2005 – 12:10 pm - Klein Email to AW with Draft Raymond Qu Sales Agreement.		
PX-67*	January 6, 2005 – 12:10 pm – Klein Email re Documents for Mrs. Qu Sale.		
PX-68*	January 6, 2005 – 4:02 pm – Klein Email to AW re Sales Tax.		
PX-69*	January 6, 2005 – 4:36 pm – Klein Email to AW with Attachments.		
PX-70*	Undated – Collection of Estate Photographs of Paintings Sold to Wei Zheng.		
PX-71*	January 10, 2005 – 2:05 pm – AW Email re Zheng Purchase List.		
PX-72*	January 10, 2005 – 2:11 pm – Email with Q&W Bill of Sale.		
PX-73*	January 10, 2005 – 2:47 pm – Email with Zheng Contract Draft. AW email with first draft of contract of sale to “Wei Zheng.”		
PX-74*	January 10, 2005 – 8:38 pm – AW/Klein Email re Certain Master Chart Paintings.		
PX-75*	January 27, 2005 – 1:53 pm – Klein Fax Proposal for Wei Zheng Sale.		

PX-76*	January 27, 2005 – 6:48 pm – AW/Klein Email re Ewald's Phone Number.		
PX-77*	January 28, 2005 – 12:54 pm – AW Email to Ewald re Proposed “Wei Zheng” Sale List.		
PX-78*	January 28, 2005 – 3:25 pm – AW Email to Ewald re Proposed “Wei Zheng” Sale List.		
PX-79*	January 28-29, 2005 – AW Emails to Ewald and Klien.		
PX-80*	February 2005 – Packet of Wei-Zheng signed Contract of Sale and Bill of Sale.		
PX-81*	February 1, 2005 – AW/Klein Emails re Sale.		
PX-82*	February 4, 2005 – 4:40 pm – AW Email to Ewald.		
PX-83*	February 4, 2005 – 4:45 pm – Fax to Klein from Schram re Wei Zheng Sale.		
PX-84*	February 4, 2005 – 12:16 pm – AW/Klein Emails re Artwork Shipment.		
PX-85*	February 7, 2005 – Klein DHL Letter to Schram re Zheng Sale.		
PX-86*	February 7, 2005 – 11:08 am – AW Emails Klein with Wei Zheng Shipping Information.		
PX-87*	February 7, 2005 – 11:43 am – Ewald/AW Emails re PA.		
PX-88*	February 7, 2005 – 12:30 pm – AW/Klein Emails re Buyer.		
PX-89*	February 7, 2005 – 12:39 pm – AW Email to Klein re Buyer Info.		
PX-90*	February 7-8, 2005 – AW Emails with Cassidy Enoch-Rex re Shipping.		
PX-91*	February 9, 2005 – 11:38 am – Klein Email to AW with Wei Zheng Documents.		
PX-92*	February 9, 2005 – 1:07 pm – AW Email to Klein re Crozier Estimate.		
PX-93*	February 9, 2005 -1:24 pm – AW Email to Klein.		

PX-94*	February 10-15, 2005 – AW/Klein Emails re Buyer Info.		
PX-95*	February 10, 2005 – Letter from Klein to McGrath re Escrow Agreement.		
PX-96*	February 11, 2005 – 9:56 am – AW Email to Cassidy Enoch-Rex of Crozier.		
PX-97*	February 11, 2005 – 10:03 am – AW/Cassidy Emails re Shipments and Payments.		
PX-98*	February 11, 2005 – 2:52 pm – Export Certificate Signed by Wei Zheng.		
PX-99*	February 16, 2005 – Klein Fax to Robert Mower and Schram (cc'd) with Escrow Agreement and Bill of Sale.		
PX-100*	February 16, 2005 – Klein Letter to Schram with Export Cert., Escrow Agreement, Contract of Sale, and Bill of Sale.		
PX-101*	February 17, 2005 – Faxes Between Crozier and Klein.		
PX-102*	February 25, 2005 – OTE Letter Signed by PA and Ewald.		
PX-103*	March 7, 2005 – Klein Letter to Schram with Check Payable to U.S. Treasury.		
PX-104*	March 11, 2005 – Klein Fax to Schram re Insurance Coverage.		
PX-105*	November 18, 2014 – Carolyn Shields Email to YK King and PA Counsel, Objecting to Zheng Deposition.	FRE 401, 403	
PX-106*	November 19, 2014 – Carolyn Shields Email to YK King and PA Counsel, Attaching Signature Page, Bank Statement, and Contract.		
PX-107*	March 6-9, 2005 – AW Emails with Crozier re Customs Tax.		
PX-108*	March 8, 2005 – 7:21 am – AW Email to Klein with Draft of Chen Mei Lin Contract.		
PX-109*	March 8, 2005 – 11:24 am. AW Email to Klein.		
PX-110*	March 8-9, 2005 – AW/Klein Emails re Second Estate Sale.		
PX-111*	March 9, 2005 – 9:53 am – AW Email to Elin re Chen Mei Lin Sale Listing.		

PX-112*	March 9, 2005 – 12:55 pm – Ewald email to Paula Powell Asking “Robert” for Review of AW’s Proposed Sale.	FRE 801	
PX-113*	March 11, 2005 – Klein Fax Proposal for Sale to Chen Mei-Lin.		
PX-114*	March 13, 2005 – Andrew Email to Klein re Schram’s Answer.		
PX-115*	March 13, 2005 – 10:03 pm – AW Follow-Up Email Regarding the Chen Mei-Lin Sale. He is told that Ewald is on jury duty.		
PX-116*	March 14, 2005 – AW/Klein Emails re IRS Extension.		
PX-117*	March 14, 2005 – 5:00 pm – Ewald Email to Paula Powell re Chinese Contact.	FRE 801	
PX-118*	March 15, 2005 – Ewald Email to AW re Sales Prices.		
PX-119*	March 16, 2005 – 11:54 am – AW/Ewald Emails re Pricing.		
PX-120*	March 16, 2005 – 12:45 pm - AW Email to Ewald re 1997 Appraisals.		
PX-121*	March 16, 2005 – 1:06 pm – AW Email to Ewald.		
PX-122*	March 16, 2005 – 4:13 pm – Ewald Email to Schram re Prices.		
PX-123*	March 16, 2005 – 9:52 pm – AW Email to Ewald.		
PX-124*	March 17, 2005 – 11:34 am – AW Email to PA and Klein re Ewald.		
PX-125*	Intentionally Blank		
PX-126*	March 17, 2005 – 12:27 pm, 12:40 pm – Klien Email to AW re Price.		
PX-127*	March 17, 2005 – 12:40 pm – Klien Email to AW re Ewald’s Pricing.		
PX-128*	March 17, 2005 – 4:58 pm – AW Email to Ewald re Chinese Painting Valuation.		
PX-129*	March 17, 2005 – 5:09 pm – Ewald Email to Griffin and Schram re Pricing.		
PX-130*	March 17, 2005 – 5:09 pm – Ewald Email to PA.		
PX-131*	March 18, 2005 – Ewald Follow-Up Email to AW.		

PX-132*	March 21, 2005 – Klein DHL Mailed Letter with Check and Draft Contract for Sale to Chen Mei-Lin.		
PX-133*	March 21, 2005 – 12:11 pm – AW Emails Klein re Ewald.		
PX-134*	March 21, 2005 – 12:11 pm – AW Email to Klein.		
PX-135*	March 21, 2005 – 2:37 pm – AW Email to Klein re Wire Instructions.		
PX-136*	March 21, 2005 – 4:37 pm – Klein Email to AW with Sale Documents.		
PX-137*	March 21, 2005 – 4:45 pm – AW Email to Klein re Shipment Methods.		
PX-138*	March 21, 2005 – 5:56 pm – AW Email to Klein re Address.		
PX-139*	March 22, 2005 – 7:21 am, 3:10 pm – AW/Klein Emails re Bank Information.		
PX-140*	March 25, 2005 – April 18, 2005 – AW Emails with Crozier and Klein re Insurance and Shipping.		
PX-141*	March 30, 2005 – Fully Executed Agreement with Chen Mei Lin. April 13, 2005 – Chen Mei Lin Bill of Sale.		
PX-142*	April 13, 2005 – Brown Raysman Email to Klein re \$1.393 Million Wire.		
PX-143*	April 21, 2005 – 2:11 pm – AW/Klein Emails re Date of Mei-Lin's Contract.		
PX – 144*	April 22, 2005 – Klein Mailed Letter with Executed Contract of Sale, Escrow Agreement, and Bill of Sale.		
PX-145*	April 22, 2005 – Klein Request for Brown Raysman to Release Funds to Estate.		
PX-146*	April 22, 2005 – AW Email to Klein re Hui-Chien and SK Paintings.		
PX-147*	April 22, 2005 – Klein and AW Emails re Hui-Chen Letter.		
PX-148*	April 29, 2005 – 12:44 pm – AW Email to Klein re Possible Anthony Chou Sale.		
PX-149*	April 29, 2005 – Klein Fax to Schram with Proposed Anthony Chou Sale.		
PX-150*	May 25, 2005 – 4:14 pm – AW Email to Klein re Shipping.		

PX-151*	May 25, 2005 – 5:44 pm – Klein Email to Schram with Proposed Anthony Chou Sale.		
PX-152*	May 27, 2005 – AW Email re Hui Chen's Agreement to Sell.		
PX-153*	June 3, 2005 – Klein Email With Inaccurate Bill of Sale.		
PX-154*	June 5-7, 2005 – AW/Klein Email re Anthony Chou's Payment to the Estate's Account.		
PX-155*	June 6, 2005 – 1:16 pm – Klein/AW Emails re Bank Information.		
PX-156*	June 6, 2005 – 3:56 pm – AW Email to Klein re Hui-Chen Sale Clearance.		
PX-157*	June 6 – 10, 2005 – AW/Klein/Enoch-Rex Emails re Crozier Visit and Shipping Costs.		
PX-158*	June 16, 2005 – Klein Letter with Fully Executed Contract of Sale to Anthony Chou.		
PX-159*	June 8, 2005 – AW Email to Klein re Adjusting Value of Paintings.		
PX-160*	July 27, 2005 – Fax Proposal from Klein to the PA for Sale to Yong Qing Ye, with Hui Chen Letters.		
PX-161*	August 29, 2005 – Schram Fax Approving Sale.		
PX-162*	Aug. 31, 2005 – 11:28 am – AW Email to Hilton Soniker with Yong Qing Ye Shipping Information.		
PX-163*	September 6, 2005 – 10:55 am – Klein Email to AW.		
PX-164*	September 6, 2005 – 10:55 am – Klein Email re Ethel Approval.		
PX-165*	October 14, 2005 – Klein Letter to Schram with Fully Executed Yong Qing Ye Sales Documents.		
PX-166*	December 13, 2005 – Klien Fax with Proposal of Second Sale to Yong Qing Ye.		
PX-167*	December 13, 2005 – 1:52 pm – Ewald Email to OTE Staff re AW.	FRE 801	

PX-168*	December 16, 2005 – Schram Fax to Klein re PA's Response to Price Issue.		
PX-169*	December 22, 2005 – AW Email to Ewald re Art Prices.		
PX-170*	January 25, 2006 – Email from Schram to Klein that Public Administrator Approved Sale to Yong Qing Ye.		
PX-171*	January 26, 2006 – Fully Executed Contract with Yong Qing Ye for Second Sale.		
PX-172*	February 8, 2006 – Shipping Invoice to Cassidy Enoch-Rex at Crozier Fine Arts in New Jersey.		
PX-173*	February 9, 2006 – Klein Fax Cover Sheet to 973-286-0992.		
PX-174*	May 11, 2011 – Email Between AW and Chienfang re OTE 156.		
PX-175*	April 23, 2008 – Klein Initial Fax Proposal of Sale of Paintings to Yue Da Jin.		
PX-176*	May 6, 2008 – 11:39 am – Schram Email to Klein re Sotheby's Appraisal.		
PX-177*	May 7, 2008 – 10:16 am – AW Email to Ewald About a Private Sale.		
PX-178*	May 7, 2008 – 12:26 pm – AW/Ewald Emails re Reduced Prices.		
PX-179*	May 7 – 17, 2008 – Emails between AW and Ewald Regarding Auctions, Negotiations, and Sale Prices.		
PX-180*	May 17, 2008 – 6:51 pm – AW/Ewald Emails re Private Sale.		
PX-181*	May 19, 2008 – 11:02 am – AW Forwarding Ewald Sale Approval.		
PX-182*	May 23, 2008 – 9:35 am – Klein Asks AW About Deposit Amount.		
PX-183*	June 4, 2008 – 4:12 pm – Klein Email to Schram with Contract.		
PX-184*	August 13, 2008 – Emails Between Klein and AW re Sale.		

PX-185*	February 24, 2009 – March 8, 2009 – AW, Klein, and Schram Emails Regarding Yue Da Jin.		
PX-186*	February 24, 2009 – March 8, 2009 – AW, Klein, and Schram emails re. Yue Da Jin.		
PX-187*	April 3, 2009 – 9:30 am – AW/Klein Emails re. 14 OTE Paintings.		
PX-188*	April 16, 2009 – 12:42 pm – Email Chain Dating Back to September 2008 Between AW and Crozier.		
PX-189*	April 22, 2009 – 10:48 am – Klein email to AW re. Wire Instructions.		
PX-190*	April 22, 2009 – 12:30 pm - AW/Klein Emails re Correct Wire Amount and Contract Instructions.		
PX-191*	August 14, 2009 – 10:31 am – Klein Email to AW re Crozier.		
PX-192*	August 17, 2009 – Fully Executed Contract of Sale with Yue Da Jin.		
PX-193*	August 24, 2009 – 10:39 am – Email re Billie Wai Contact Info.		
PX-194*	August 24, 2009 – September 2, 2009 – AW Emails with Crozier Regarding Hong Kong Delivery.		
PX-195*	Undated – OTE Valuation Notes for Chen Mei Lin Sale.		
PX-196*	Undated – Ewald Notes on Yong Qing Ye 2 Sale.	FRE 801 if for truth; Undesignated expert testimony if for truth	
PX-197*	January 7, 2004 - Ewald Email to OTE Staff Member.	FRE 801	
PX-198*	February 4, 2004 - Ewald Typed Chart with Condition of Paintings.	FRE 801	
PX-199*	February 11, 2005 - OTE Email to PA Setting Billing Rate.		
PX-200*	February 17, 2004 – OTE Letter to PA Identifying Top Valued Paintings.	FRE 801; Undesignated	

		expert testimony	
PX-201*	February 20, 2004 – OTE Notes.	FRE 801	
PX-202*	February 25, 2005 – OTE Letter to PA.		
PX-203*	March 16, 2005 – OTE Initial Review for Chen Mei Lin Sale.	If for truth: FRE 801; Undesignated expert testimony	
PX-204*	March 17, 2005 – OTE Appraisal Notes for Chen Mei Lin Sale.	If for truth: FRE 801; undesignated expert testimony	
PX-205*	April 29, 2005 – OTE Notes for Proposed Sale to Anthony Chou.	If for truth: FRE 801; undesignated expert testimony	
PX-206*	May 5, 2005 – OTE Review of Seven Paintings Proposed to Be Sold to Anthony Chou.	If for truth: FRE 801; undesignated expert testimony	
PX-207*	August 17, 2005 – Ewald Sale Review letter.	If for truth: FRE 801; undesignated expert testimony	
PX-208*	August 22, 2005 – Ewald Yong Qing Ye Notes.	If for truth: FRE 801; undesignated expert testimony	
PX-209*	August 25, 2005 – Ewald Sale Review Letter.	If for truth: FRE 801; undesignated expert testimony	
PX-210*	December 15, 2005 – Ewald Review of Second Yong Qing Ye Proposal.	If for truth: FRE 801; undesignated expert testimony	
PX-211*	January 25, 2006 – PA Email to OTE and Schram.	If for truth: FRE 801;	
PX-212*	May 2, 2008 – OTE Valuation of 14 paintings for Sale to Yue Da Jin.	If for truth: FRE 801; undesignated	

		expert testimony	
PX-213*	September 19, 2005 – January 25, 2006 – Email Chain Between Klein, Scham, Ewald, and PA Regarding Auctioning Sotheby's Paintings.		
PX-214*	December 20, 2005 – MeeSeen Loong Email to AW re List of Paintings.		
PX-215*	December 23, 2005 – Klein Email to PA re AW's Auction Proposals.		
PX-216*	January 26, 2006 – Schram Email to Klein Confirming AW's Selection of Paintings for Auction.		
PX-217*	August 20, 2008 – Klein Email re Sotheby's Paintings.		
PX-218*	September 17 – 24, 2008 – Email Chain Between AW and Croziers.		
PX-219	Bao Wu Tang – Magnificent Collection of Classical Chinese Paintings and Calligraphy from Abroad – Hardcover Exhibition Book.	FRE 801	
PX-219-A	Combination of Estate OTE Photographs of Paintings referenced in Bao Wu Tang Capital Museum Catalogue		
PX-220	Bao Wu Tang Catalogue Preface Translation.	FRE 801, 901	
PX-221	November 9, 2009 Article. Published by China.com.cn, and certified translation, entitled “Domestic and Foreign Treasures Gathered in Beijing.”	FRE 801	
PX-222	November 13, 2009 Article. Published by China.com.cn and 71ertified translation entited “Invaluable Original Painting ‘Xishan Xianguan’” from Ni Zan.	FRE 801	
PX-223	November 19, 2009 CCTV4 Broadcast, Guobao Dang'an, National Treasure Files, regarding Bao Wu Tang Exhibition (without audio).	FRE 801, 901	
PX-224	Photograph of Andrew Wang at Bao Wu Tang Exhibition.	FRE 801	
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PX-228	Second Photograph of Wu Zhen “Wild Bamboo” at Capital Museum Exhibition.	FRE 801, 901	
PX-229	Bao Wu Tang Video Clip still taken from PX 230 – PX	FRE 801, 901	
PX-230	Video of “Green Mountain Landscape” Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition (Part 1)	FRE 901	
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PX-232	Video of Wu Zhen “Wild Bamboo” and Bian Wu’s “Wild Geese among the Reeds” Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
PX-232-A	Photographic still from 232	FRE 901	
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PX-239	Video of Wang JiQian Information Plaque Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
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PX-242	Video of Outside Banner of 2009 Bao Wu Tang Capital Museum Exhibition. (Part 2)	FRE 901	
PX-243	Video of Outside Banner of 2009 Bao Wu Tang Capital Museum Exhibition. (Part 3)	FRE 901	
PX-244	Video of Wang Hui's "Shade of Tree in Summer" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 1)	FRE 901	
PX-245	Video of Wang Hui's "Shade of Tree in Summer" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 2)	FRE 901	
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PX-248	Video of Hua Yan's "Sparrows" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 1)	FRE 901	
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PX-250	Video of Chu Ta's "Twin Crow" and Yao Shou's "Landscape" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
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PX-253	Video of Xia Chang's "Cliff in Rain of Spring" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
PX-254	Video of Ni Zan's "Rock and Bamboo" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
PX-255	Video of 2009 Bao Wu Tang Capital Museum Hallway. (Part 1)	FRE 901	
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PX-257	Video of Wang Jian's "Landscape" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
PX-258	Video of Wang Duo's "Calligraphy" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition.	FRE 901	
PX-259	Video of Guo Xi's "Travelers in the Autumn Mountains" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 1)	FRE 901	
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PX-260-A	Photographic still from 260	FRE 901	
PX-261	Video of Guo Xi's "Travellers in the Autumn Mountains" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 3)	FRE 901	

PX-262	Video of Guo Xi's "Travellers in the Autumn Mountains" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 4)	FRE 901	
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PX-265	Video of Guo Xi's "Travellers in the Autumn Mountains" Displayed at the 2009 Bao Wu Tang Capital Museum Exhibition. (Part 7)	FRE 901	
PX-266	2010 Poly Museum Exhibition Catalogue.	FRE 801, 901	
PX-267	April 30, 2008 – 9:30 am – Chieftown Beijing Auction Catalogue.	FRE 801, 901	
PX-268	April 30, 2008 – 13:30 – Chieftown Beijing Spring Auction Catalogue.	FRE 801, 901	
PX-269	Spring 2008 Chieftown Beijing Auction Catalogue (soft cover).	FRE 801, 901	
PX-270	2008 Chieftown Beijing Spring Auction Catalogue (soft cover).	FRE 801, 901	
PX-271	Spring 2008 Chieftown Auction (HK) Catalogue.	FRE 801, 901	
PX-272	Autumn 2008 Chieftown Auction (HK) Catalogue.	FRE 801, 901	
PX-273	December 6, 2008 – 14:00 – Chieftown Beijing Autumn Auction Catalogue.	FRE 801, 901	

PX-274	June 26, 2009 – 16:30 – Chieftown Beijing Auction Catalogue.	FRE 801, 901	
PX-275	May 26, 2009 – 17:00 – Chieftown (HK) Spring Auction Catalogue.	FRE 801, 901	
PX-276	November 30, 2009 – 15:30 – Chieftown (HK) Autumn Auction Catalogue.	FRE 801, 901	
PX-277	December 16, 2009 – 10:00 am – Chieftown Beijing Auction Catalogue.	FRE 801, 901	
PX-278	April 30, 2008 – Artron.Net Record of the Auction of Ni Zan’s “Bamboo and Rock.” [OTE 106]	FRE 401, 403, 801, 901	ARR
PX-279	April 30, 2008 – Chieftown Beijing Record of the Auction of Ni Zan’s “Bamboo and Rock.” [OTE 106]	FRE 401, 403, 801, 901	ARR
PX-280	King Photo of NiZan’s “Bamboo and Rock” [OTE 106].	FRE 401, 403, 801, 901	ARR
PX-281	OTE Photo of NiZan’s “Bamboo and Rock” [OTE 106].	FRE 401, 403, 801, 901	ARR
PX-282	May 26, 2009 – Artron.Net Record of Auction of Shi Tao’s “Vegetables.” [OTE 115]	FRE 401, 403, 801, 901	ARR
PX-283	May 26, 2009 – Artron.Net Record of Auction of Shi Tao’s “Vegetables.” [OTE 115]	FRE 401, 403, 801, 901	ARR
PX-284	December 6, 2008 – Artron.Net Record of the Auction of Qian Du “Watching the Clouds Arise.” [OTE 153]	FRE 401, 403, 801, 901	ARR
PX-285	December 6, 2008 – Chieftown Beijing Record of the Auction of Qian Du “Watching the Clouds Arise.” [OTE 153]	FRE 401, 403, 801, 901	ARR
PX-286	April 30, 2008 – Chieftown Beijing Record of the Auction of Tang Yin’s “Mountain Pavilion.” [OTE 238]	FRE 401, 403, 801, 901	ARR
PX-287	December 12, 2010 – Artron.Net Record of the Auction of Ni Zan’s “Trees on the River Shore.” [OTE 129]	FRE 401, 403, 801, 901	ARR
PX-288	December 3, 2013 – Artron.Net Record of the Auction of Wang Hui’s “Summer Woods.” [OTE 130]	FRE 401, 403, 801, 901	ARR

PX-289	June 6, 2016 – Artron.Net Record of the Auction of Wu Li’s “Landscape Album.” [OTE 136]	FRE 401, 403, 801, 901	ARR
PX-290	December 1, 2008 – Artron.Net Record of the Auction of Anonymous “Horse and Groom.” [OTE 137]	FRE 401, 403, 801, 901	ARR
PX-291	May 28, 2008 – Artron.Net Record of the Auction of Li Song’s “Drinking Banquet.” [OTE 133]	FRE 401, 403, 801, 901	ARR
PX-292	May 28, 2008 – Chieftown Hong Kong Record of the Auction of Li Song’s “Drinking Banquet.” [OTE 133]	FRE 401, 403, 801, 901	ARR
PX-293	December 12, 2008 – Artron.Net Record of Auction of Wang Hui’s “Woodcutter of Mt. Luofu.” [OTE 121]	FRE 401, 403, 801, 901	ARR
PX-294	December 12, 2008 – Chieftown Beijing record of auction of Wang Hui’s “Woodcutter of Mt. Luofu.” [OTE 121]	FRE 401, 403, 801, 901	ARR
PX-295	December 16, 2009 – Artron.Net Record of Auction of Wang Yuanqi’s “Landscape after Huang Gongwang.” [OTE 128]	FRE 401, 403, 801, 901	ARR
PX-296	June 3, 2010 – Artron.Net Record of Auction of Xu Wei’s “Calligraphy in Cursive Script.” [OTE 161]	FRE 401, 403, 801, 901	ARR
PX-297	June 3, 2010 – Poly Auction Record of the Auction of Xu Wei’s “Calligraphy in Cursive Script.” [OTE 161]	FRE 401, 403, 801, 901	ARR
PX-298	December 12, 2013 – Artron.Net Record of Auction of Ma Yuan’s “Scholar Under Pine.” [OTE 159]	FRE 401, 403, 801, 901	ARR
PX-299	December 12, 2013 – Artron.Net Record of Auction of Ma Yuan’s “Crane & Scholar.” [OTE 158]	FRE 401, 403, 801, 901	ARR
PX-300	April 6, 2014 – Artron.Net Record of Auction of Wang Yuanqi’s “Landscape after Huang Gongwang.” [OTE 120]	FRE 401, 403, 801, 901	ARR
PX-301	April 30, 2008 – Artron.Net Record of the Auction of Ren Yi’s “Three Knights Errant.” [OTE 126]	FRE 401, 403, 801, 901	ARR
PX-302	April 30, 2008 – Chieftown Beijing Record of the Auction of Ren Yi’s “Three Knights Errant.” [OTE 126]	FRE 401, 403, 801, 901	ARR

PX-303	May 28, 2008 – Artron.Net Record of the Auction of Ding YunPeng’s “Scene from Tao YuanMing.” [OTE 224]	FRE 401, 403, 801, 901	ARR
PX-304	May 28, 2008 – Chieftown Hong Kong Record of the Auction of Ding YunPeng’s “Scene from Tao YuanMing.” [OTE 224]	FRE 401, 403, 801, 901	ARR
PX-305	December 6, 2008 – Artron.Net Record of the Auction of Shi Tao’s “Banana Palm and Rock.” [OTE 88]	FRE 401, 403, 801, 901	ARR
PX-306	December 6, 2008 – Chieftown Beijing Record of the Auction of Shi Tao’s “Banana Palm and Rock.” [OTE 88]	FRE 401, 403, 801, 901	ARR
PX-307	December 7, 2013 – Artron.Net Record of the Auction of Wang Jian’s “Landscapes in Handscroll.” [OTE 156]	FRE 401, 403, 801, 901	ARR
PX-308	June 3, 2010 – Artron.Net Record of the Auction of Wang YuanQi’s “Landscape after Huan GonWang.” [OTE 218]	FRE 401, 403, 801, 901	ARR
PX-309	December 4, 2010 – Artron.Net Record of the Auction of Huang Shen’s “Weaving Lady.” [OTE 90]	FRE 401, 403, 801, 901	ARR
PX-310	November 25, 2014 – Artron.Net Record of the Auction of Anonymous/Lu Ji’s “Bird in Landscape.” [OTE 89]	FRE 401, 403, 801, 901	ARR
PX-311	November 28, 2016 – Artron.Net Record of the Auction of Fang CongYi’s “Cloudy Landscape.” [OTE 131]	FRE 401, 403, 801, 901	ARR
PX-312	Photographs of CK Lam Accounting Office and Fourseas Building in Kowloon Hong Kong.	FRE 801, 901	ARR
PX-313	Wang Family Photograph	FRE 401, 403	
PX-314	Intentionally Blank		
PX-315	Undated – Names and Photographs of “21+4” Group of Paintings.	FRE 401, 403, 408	ARR

PX-316	Undated – Scan of Key from AW.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-317	Undated – Scan of Key from AW.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-318	May 11, 2005 – Shanghai Hotel Co., Ltd. Room Rental Invoice.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-319	May 11, 2005 – Shanghai Hotel Co., Ltd. Room Rental Payment Receipt.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-320	May 11, 2005 – Shanghai Exchange Receipt Record Signed by YK and AW.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-321	May 11, 2005 – “D2014” Safe Deposit Box Opening Form.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-322	May 12, 2005 – Agreement Between YK and AW Regarding the Donation of the Wu Painting.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-323	June 6, 2005 – AW Fax to Hugh Mo.	FRE 401, 403, 408	Excluded per Motion in Limine
PX-324	March 30, 2006, May 16, 2007, and March 18, 2008 – Safe Deposit Box Payment Receipts for “D2014.”	FRE 401, 403, 408	Excluded per Motion in Limine
PX-325	March 25, 2009 – Safe Deposit Box Payment Receipts for “D2014.”	FRE 401, 403, 408	Excluded per Motion in Limine
PX-326	2009 Video of YK and Municipal Court Opening of Safe Deposit Box “D2014.” (Part 1) (without audio)	FRE 401, 403, 408	Excluded per Motion in Limine
PX-327	2009 Video of YK and Municipal Court Opening of Safe Deposit Box “D2014.” (Part 2) (without audio)	FRE 401, 403, 408	Excluded per Motion in Limine
PX-328	2009 – Photographs of Wu Zongyuan Copy from Safe Deposit Box “D2104.”	FRE 401, 403, 408	Excluded per Motion in Limine
PX-329	January 18, 2006 – AW Email.		ARR

PX-330-A	May 2, 2007 - SK Wires to Hui Chen Wang Chen's Family.	FRE 401	ARR
PX-330-B	October 3, 2008 – SK Wire to Hui Chen	FRE 401	ARR
PX-331	September 22, 2009 - AW September 2009 Chase Statement.	FRE 401, 403	Excluded per Motion in Limine
PX-332	July 22, 2010 - Le Tao Limited Incorporation Records.	FRE 901	ARR
PX-333	May 11, 2011 - AW Email to Chienfang re OTE 156.		
PX-334	April 30, 2013 - Contract of Sale Between Fortuna Valentino and Le Tao Limited.	FRE 401, 403	Excluded per Motion in Limine
PX-335	April 30, 2013 - Amendment to Contract of Sale.	FRE 401, 403	Excluded per Motion in Limine
PX-336	May 6, 2013 - May 2013 Bank Records.	FRE 401, 403	Excluded per Motion in Limine
PX-337	September 2013 - SK Irrevocable Trust Bank Records.	FRE 401, 403	Excluded per Motion in Limine
PX-338	September 25, 2013 - SK Wang Irrevocable Trust.	FRE 401, 403	Excluded per Motion in Limine
PX-339*	September 25, 2013 - IRS Tax number Assigned to SK Irrevocable Trust.	FRE 401, 403	Excluded per Motion in Limine
PX-340	October 2, 2013 - Records from Lau & Associates Regarding Purchase of 117 Old House Road.	FRE 401, 403	Excluded per Motion in Limine
PX-341	October 2, 2013 - Deed for Purchase \$5.9 Million Property.	FRE 401, 403	Excluded per Motion in Limine
PX-342	June 12, 2015 - June 2015 HSBC Statement of Rong Luo.	FRE 401, 403	Excluded per Motion in Limine
PX-343	July 2014 - Residential Contract of Sale for the Purchase of 36 Glenwood Road, Roslyn Harbor, N.Y. 11576 for \$3,850,000.	FRE 401, 403	Excluded per Motion in Limine

PX-344	February 23, 2015 - Closing Statement fro 36 Glenwood Road, Roslyn Harbor, New York.	FRE 401, 403	Excluded per Motion in Limine
PX-345	July 16, 2015 -Real Property Transfer Report and Related Documents Signed by Cao Ching Wang to purchase \$1.6 million Property.	FRE 401, 403	Excluded per Motion in Limine
PX-346	July 26, 2016 - Closing Statement and Cashier's Checks for "Jie Wang Loving Trust" purchase of One Irving Place, Unit P-20G, New York, NY 10003 with Cashier's Checks.	FRE 401, 403	Excluded per Motion in Limine
PX-347	March 1, 2017 - HSBC Records for Rong Luo.	FRE 401, 403	Excluded per Motion in Limine
PX-348	March 23, 2017 - Records of Apartment Purchase and Rong Luo Transfer.	FRE 401, 403	Excluded per Motion in Limine
PX-349	Undated - Photographs of Two SK's Paintings Auctioned at Chieftown.	FRE 801, 901	ARR
PX-350	August 26, 2003 - Hui Chen Letter.	FRE 401	
PX-351	August 28, 2003 - Hui Chen Letter re Power of Attorney.	FRE 401	
PX-352	June 8, 2005 - AW Email to Klein re Painting Value Adjustment.		
PX-353	November 18, 2006 - AW and Chienfang Email Chain.		
PX-354	March 3, 2007 - 2:25 pm - AW and Chienfang Email Chain.		
PX-355	March 5-6, 2007 - AW/Edie Hu Emails re Tang Yin.	FRE 401	
PX-356	March 9, 2007 - Edie Hue Response Email to AW About Tang Yin Image.	FRE 401	
PX-357	March 14, 2007 - AW and Chienfang Email Chain.		
PX-358	November 11, 2007 - 11:50 am - AW Email.		
PX-359	September 22, 2009 - AW Bank Statement.	FRE 401, 403	Excluded per Motion in Limine
PX-360	February 8-24, 2010 - AW/Klein Emails re Title Transfers.	FRE 401, 403	Excluded per Motion in Limine
PX-361	March 25, 2010 - AW/Howard-Sneyd Email Chain.	FRE 401	

PX-362	May 18, 2010 - AW/Soniker Emails re AW's Conversation with the Chinese Government Agency.		
PX-363	December 5, 2010 - Transcript of AW Speaking at 2010 Symposium.	FRE 801, 901	
PX-364	March 27, 2011 - February 4, 2012 - AW Emails with Chienfang.		
PX-365	April 21 - May 5, 2011 - Email Chain Between AW and Chienfang.		
PX-366	May 11, 2011 - 10:08 am - AW Email to Chienfang re Prior Sale of Painting.		
PX-367	May 11, 2011 - 10:12 am - AW Email to Chienfang.		
PX-368	May 11, 2011 - 10:19 am - AW Email to Chienfang re Painting at POLY Show.		
PX-369	May 12, 2011 - Emails re Chieftown Auction.		
PX-370	May 12, 2011 - 11:41 am - AW Email to Chienfang re Five Paintings to be Sent.		
PX-371	March 26, 2012 - AW Emails with Michael Gallis re CC Wang.		
PX-372	March 9-11, 2014 - AW/Klein Emails re Two New Buyers for Remaining Artwork.		
PX-373*	June 3, 2014 - Email from Bruce MacLaren to AW.		
PX-374*	July 20, 2014 - AW Email to Anthony Costa re Publishing Permission for Paintings.		
PX-375*	May 23, 2015 - AW Emails with Elizabeth Hammer Regarding Hui Chen.		
PX-376*	May 24, 2015 - Howard-Sneyd Email to AW re Baowutang Exhibition.		
PX-377*	August 4, 2003 - New York County Surrogate's Court Order Appointing AW as Preliminary Executor of the Estate of Chi-Chuan Wang.		
PX-378*	August 2006 - Affidavit of AW in Filed in Opposition to Petition of YK to Remove AW as Preliminary Executor in Relation to the Shanghai Exchange.	FRE 401, 403	Excluded per Motion in Limine
PX-379*	December 14, 2007 - Estate United States Tax Court Petition.		

PX-380*	December 11, 2012 - AW Answer to Interrogatories re the Shanghai Exchange.	FRE 401, 403	Excluded per Motion in Limine
PX-381*	May 12, 2014 - Petition of James E. Tcheng, M.D., to Remove AW as Estate Fiduciary Filed in the New York County Surrogate's Court.	FRE 401, 403, 801	Excluded per Motion in Limine
PX-382*	August 28, 2014 - Verified Answer to the May 12, 2014 Removal Petition, Signed by SK.	FRE 401, 403	Excluded per Motion in Limine
PX-383*	December 5, 2014 - Subpoena to Wei Zheng.	FRE 401, 403	ARR
PX-384*	March 30, 2015 - Affidavit of AW re "D2014" Safe Deposit Box and Key.	FRE 401, 403	Excluded per Motion in Limine
PX-385*	April 16, 2015 - Affidavit of AW re Wei Zheng Sales.		
PX-386*	May 9, 2017 - New York County Surrogate's Court Decree Finding Fraud, Undue Influence, and Lack of Capacity re February 18, 2003 Will.	FRE 403	
PX-387*	June 7, 2018 - New York Supreme Court Appellate Division, First Department Decision Affirming May 19, 2017 Decree.	FRE 403	ARR
PX-388*	January 2, 2020 - New York Supreme Court Appellate Division, First Department Decision Finding February 10, 2003 Codicil to Be the Product of Fraud and Undue Influence through Collateral Estoppel.	FRE 403	ARR
PX-389*	September 23, 2014 - Complaint Filed in the Southern District of New York by YK King <i>et al.</i> (Index No. 14-cv-07694)	FRE 801	ARR
PX-390*	September 27, 2016 - Amended Complaint Filed in the Southern District of New York by YK King. (Index No. 14-cv-07694)	FRE 801	ARR
PX-391*	June 1, 2018 - AW, Bao Wu Tang, SK, Jian Bao Gallery - Answer to Amended RICO Complaint. (Index No. 14-cv-07694)		
PX-392*	August 8, 2018 - Plaintiff YK King's First Set of Document Demands on AW.	FRE 401	ARR
PX-393*	August 8, 2018 - Plaintiff YK King's First Set of Interrogatories to AW.	FRE 401	ARR
PX-394*	August 9, 2018 - Plaintiff YK King's First Set of Document Demands on SK.	FRE 401	ARR
PX-395*	August 9, 2018 - Plaintiff YK King's First Set of Interrogatories to SK.	FRE 401	ARR

PX-396*	September 7, 2018 - AW Original Answer to First Set of Interrogatories.		
PX-397*	September 7, 2018 - SK Original Answer to First Set of Interrogatories.		
PX-398*	October 11, 2018 - AW SUPPLEMENTAL Answer to Interrogatories.		
PX-399*	November 6, 2018 - AW SECOND Supplemental Answer to Interrogatories.		
PX-400	December 21, 2018 - AW THIRD Supplemental Responses to Interrogatories.		
PX-401*	December 21, 2018 - SK SUPPLEMENTAL Response to First Set of Interrogatories.		
PX-402*	February 1, 2019 - AW and SK Amended Rule 26 Initial Disclosures.		
PX-441	July 29, 2005 - Letter from Klein to Hugh Mo.	FRE 401	
PX-442	March 8, 2010 - YK Affidavit in Support of Motion for Leave to Supplement Her Removal Petition.	FRE 401, 801	Excluded per ruling on motion in limine
PX-443	September 9, 2010 - December 13, 2010 - Collection of Letters From YK's Counsel, Martin Garbus.	FRE 401, 801	ARR
PX-444	December 18, 2010 - Schram Letter to Martin Garbus Re Accounting.	FRE 401, 801	ARR
PX-445	May 9, 2011 - YK Verified Petition for a Compulsory Accounting of Estate Sales.	FRE 401, 801	ARR
PX-446	March 13, 2013 - Eaton Van Winkle Letter to David Rose.	FRE 401, 801	ARR
PX-447*	Binder of Folder Produced on May 9, 2019 "Wei Zheng - 2.16.2005 - 17 Paintings." This binder includes images from one or more of the following sources for each of the 17 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81		

	photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-448*	Binder of Folder Produced on May 9, 2019 "Chen Mei Lin - 4.13.2005 - 24 Paintings." This binder includes images from one or more of the following sources for each of the 24 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-449*	Binder of Folder Produced on May 9, 2019 "Anthony Chou - 6.16.2005 - 17 Paintings." This binder includes images from one or more of the following sources for each of the 17 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-450*	Binder of Folder Produced on May 9, 2019 "Yong Qing Ye - 9.22.2005 - 18 Paintings." This binder includes images from one or more of the following sources for each of the 18 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-451*	Binder of Folder Produced on May 9, 2019 "Yong Qing Ye - 2.16.2006 - 8 Paintings." This binder includes images from one or more of the following sources for each of the 8 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-452*	Binder of Folder Produced on May 9, 2019 "Yue Da Jin- 8.17.2009 - 14 Paintings." This binder includes images from one or more of the following sources for each of the 14 paintings: (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004;		

	and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-453*	Binder of Chi-Chuan Wang Seals Added to Certain of the Estate's 98 Paintings. Images to be taken from (1) Artron.Net Auction records; (2) Chieftown Auction Records; (3) Excerpt from Group of 81 photos; (4) Photos taken by Kings; (5) Inventory Photos taken by OTE between 2003 and 2004; and (6) Bao Wu Tang Poly Museum and Capital Museum Publications.		
PX-454-a	January 15, 2019 Pre-Motion Conference Letter of Sam P. Israel to Hon. James L. Cott.	FRE 403, 801	ARR
PX-454-b	Excerpts from January 18, 2019 Conference Transcript	Objections reserved until review	
PX-455*	Timeline of Estate sales of paintings between 2005 and 2009.	Objections reserved until review	
PX-456*	Timeline of AW ¹ and SK's Testimonies, Sworn-Affirmations, and Disclosures.	Objections reserved until review	
PX-457*	Demonstrative showing sale values of certain of the 98 Estate-sold paintings.	Objections reserved until review	
PX-458*	Demonstrative showing relationship among various "Wang Family" participants.	Objections reserved until review	
PX-459*	Demonstrative showing financial transfers between alleged members of the "Wang Family."	Objections reserved until review	
PX-460*	Demonstrative showing geographic locations related to the sale and display of Estate-sold paintings from Google Maps.	Objections reserved until review	
PX-461*	Demonstrative Chart Reciting Re-Sale Prices of Paintings and Auction Houses at which they Appeared derived from Arton.Net records.	Objections reserved until review	
PX-462	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-463	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-464	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-465	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-466	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-467	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-468	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-469	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-470	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-471	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-472	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-473	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	

PX-474	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-475	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-476	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-478	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-479	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-480	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-481	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-482	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-483	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-484	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-485	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-486	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-487	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-488	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-489	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-490	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-491	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-492	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-493	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-494	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-495	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-496	Andrew Wang 6/25/2019 Deposition Clip	Not an exhibit	
PX-497	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-498	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-499	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-500	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-501	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-502	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-503	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-504	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-505	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-506	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-507	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-508	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-509	Andrew Wang 12/17/2013 Deposition Clip	Not an exhibit	
PX-510	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-511	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-512	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-513	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-514	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	

PX-515	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-516	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-517	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-518	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-519	Andrew Wang 12/19/2013 Deposition Clip	Not an exhibit	
PX-520	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-521	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-522	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-523	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-524	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-525	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-526	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-527	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-528	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-529	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-530	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-531	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-532	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-533	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-534	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-535	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-536	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-537	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-538	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-539	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-540	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-541	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-542	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-543	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-544	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-545	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-546	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-547	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-548	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-549	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-550	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-551	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-552	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-553	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-554	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	

PX-555	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-556	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-557	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-558	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-559	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-560	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-561	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-562	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-563	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-564	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-565	Shou-Kung Wang 6/24/2019 Deposition Clip	Not an exhibit	
PX-566	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-567	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-568	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-569	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-570	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-571	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-572	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-573	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-574	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-575	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-576	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-577	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-578	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-579	Andrew Wang 12/12/2013 Deposition Clip	Not an exhibit	
PX-580	OTE 83 Arton.net Resale Record – 12/06/2008	FRE 401, 403, 801, 901	ARR
PX-582	OTE 87 Arton.net Resale Record – 6/6/10	FRE 401, 403, 801, 901	ARR
PX-583	OTE 88 Arton.net Resale Record – 6/6/08	FRE 401, 403, 801, 901	ARR
PX-584	OTE 89 Arton.net Resale Record – 11/25/14	FRE 401, 403, 801, 901	ARR
PX-585	OTE 92 Arton.net Resale Record – 06/06/2015	FRE 401, 403, 801, 901	ARR
PX-586	OTE 94 Arton.net Resale Record – 06/21/10	FRE 401, 403, 801, 901	ARR
PX-587	OTE 94 Arton.net Resale Record – 12/1/08	FRE 401, 403, 801, 901	ARR
PX-588	OTE 106 Arton.net Resale Record – 04/30/08	FRE 401, 403, 801, 901	ARR
PX-589	OTE 112 Arton.net Resale Record – 05/28/08	FRE 401, 403, 801, 901	ARR

PX-590	OTE 115 Arton.net Resale Record – 05/26/09	FRE 401, 403, 801, 901	ARR
PX-591	OTE 120 Arton.net Resale Record – 04/06/14	FRE 401, 403, 801, 901	ARR
PX-592	OTE 121 Arton.net Resale Record – 06/21/10	FRE 401, 403, 801, 901	ARR
PX-593	OTE 121 Arton.net Resale Record – 12/06/08	FRE 401, 403, 801, 901	ARR
PX-594	OTE 126 Arton.net Resale Record – 04/30/08	FRE 401, 403, 801, 901	ARR
PX-595	OTE 127 Arton.net Resale Record – 05/26/09	FRE 401, 403, 801, 901	ARR
PX-596	OTE 128 Arton.net Resale Record – 12/16/09	FRE 401, 403, 801, 901	ARR
PX-597	OTE 129 Arton.net Resale Record – 12/12/10	FRE 401, 403, 801, 901	ARR
PX-598	OTE 133 Arton.net Resale Record – 05/28/08	FRE 401, 403, 801, 901	ARR
PX-599	OTE 135 Arton.net Resale Record – 11/23/09	FRE 401, 403, 801, 901	ARR
PX-600	OTE 136 Arton.net Resale Record – 06/05/16	FRE 401, 403, 801, 901	ARR
PX-601	OTE 137 Arton.net Resale Record – 06/21/10	FRE 401, 403, 801, 901	ARR
PX-602	OTE 147 Arton.net Resale Record – 05/28/08	FRE 401, 403, 801, 901	ARR
PX-603	OTE 150 Arton.net Resale Record – 11/28/16	FRE 401, 403, 801, 901	ARR
PX-604	OTE 153 Arton.net Resale Record – 12/06/08	FRE 401, 403, 801, 901	ARR
PX-605	OTE 156 Arton.net Resale Record – 12/06/08	FRE 401, 403, 801, 901	ARR
PX-606	OTE 158 Arton.net Resale Record – 12/03/13	FRE 401, 403, 801, 901	ARR
PX-607	OTE 159 Arton.net Resale Record – 12/03/13	FRE 401, 403, 801, 901	ARR
PX-609	OTE 161 Arton.net Resale Record – 06/03/10	FRE 401, 403, 801, 901	ARR
PX-610	OTE 201 Arton.net Resale Record – 11/13/16	FRE 401, 403, 801, 901	ARR
PX-611	OTE 224 Arton.net Resale Record – 05/10/11	FRE 401, 403, 801, 901	ARR
PX-612	OTE 224 Arton.net Resale Record – 05/28/08	FRE 401, 403, 801, 901	ARR
PX-613	OTE 224 Arton.net Resale Record – 12/13/15	FRE 401, 403, 801, 901	ARR
PX-614	OTE 227 Arton.net Resale Record – 10/06/13	FRE 401, 403, 801, 901	ARR
PX-616	OTE 240 Arton.net Resale Record – 05/27/19	FRE 401, 403, 801, 901	ARR

PX-617	OTE 241 Arton.net Resale Record – 05/04/17	FRE 401, 403, 801, 901	ARR
PX-618	OTE 241 Arton.net Resale Record – 05/06/13	FRE 401, 403, 801, 901	ARR
PX-619	OTE 241 Arton.net Resale Record – 11/10/09	FRE 401, 403, 801, 901	ARR
PX-620	OTE 1001 Arton.net Resale Record – 11/10/09	FRE 401, 403, 801, 901	ARR
PX-621	OTE 1001 Arton.net Resale Record – 12/04/10	FRE 401, 403, 801, 901	ARR

2. Defendants' Exhibits

No.	Description	Objections	Advance Ruling Requested
DX1.	Alan Appel Inventory (AW_SK00007906)	802; 403	
DX2.	Appraisal 11/15/79 (Rose-SCT-00014994)	403	ARR
DX3.	Jian Bao Gallery Certificate 12/28/83 (WANG_KING 00031529)	802	ARR
DX4.	JBG Sotheby's Receipt for Ma Yuan Album (WANG_KING 00031543)	802	ARR
DX5.*	SK Checks to Sotheby's (WANG_KING 00031544)		
DX6.	CC Wang Bank Direction re Northwich, 3/25/99 (WANG-SCT-0000030044)	401; 802	
DX7.	Soon Huat Contract 8/21/1999 (KING-SCT-000000134-35)	403; 802	ARR
DX8.	Agreement between C.C. and Cy Art, 1/2/00 (PA-SCT-000003199)	401	
DX9.	Check, 1/5/00 (K002142)	401; 403	

DX10.	Check, 1/12/00 (K002141)	401; 403	
DX11.	C.C. Wang letter to Charles H. Greenthal Management 2/7/00 (Rose-SCT-00005690)	802; 401; 901	
DX12.	CC Wang Letter to Jose Dominguez, 2/7/00 (Rose-SCT-00005693)	802; 401; 901	
DX13.	Soon Huat Contract 3/15/2000 (KING-SCT-000000137-38)	403; 802	ARR
DX14.	Soon Huat Contract 4/28/2000 (KING-SCT-000000140-41)	403; 802	ARR
DX15.	CC Wang Letter to Ray Martin, 5/8/00 (WANG-SCT-000028822)	802; 403	
DX16.	CC Wang Letter to J.E. Eskenazi, 5/8/00 (WANG-SCT-000028823)	802; 403	
DX17.	CC Wang Letter to Max Doktofsky, 5/8/00 (WANG-SCT-000028824)	802; 403	
DX18.	CC Wang Letter to Tonia Hsu, 5/8/00 (WANG-SCT-000028825)	802; 403	
DX19.	CC Wang Letter to Joe Erlichster, 5/8/00 (WANG-SCT-000028826)	802; 403	
DX20.	CC Wang Letter to Grace Eng, 5/8/00 (WANG-SCT-000028827)	802; 403	
DX21.	CC Wang Letter to Frances Yuan, 5/8/00 (WANG-SCT-000028828)	802; 403	

DX22.	CC Wang Letter to Arnold Chang, 5/8/00 (WANG-SCT-000028829)	802; 403	
DX23.	CC Wang Letter to Max Hearn, 5/8/00 (WANG-SCT-000028830)	802; 403	
DX24.	CC Wang Letter to Blanche Kahn, 5/8/00 (WANG-SCT-000028831)	802; 403	
DX25.	Painting list, 5/21/00 (K001860)	401; 403	
DX26.	Wire Request Form, 6/6/00 (K001859)	401; 403	
DX27.	Wire Transfer form, 6/6/00 (K001943)	401; 403	
DX28.	Wire Request Form, 6/6/00 (K001944)	401; 403	
DX29.	YK Will (AWSK_00003775-3800)	401; 403	
DX30.	Soon Huat Contract 7/5/00 (KING-SCT-000000143-44)	401; 403; 802	ARR
DX31.	Soon Huat Contract 8/16/2000 (KING-SCT-000000146-47)	401; 403; 802	ARR
DX32.	Tie Fung Purchase List and contracts (K001789-96)	401; 403; 802	ARR
DX33.	List of paintings (K002143)	401; 403; 901; 802	ARR
DX34.	Christie's Appraisal for Raymond King (K002716)	802; 702; 901; 403	
DX35.	Codicil (AWSK_00003801-05)	403	
DX36.	Ledger Entry, 8/7/02 (K002147)	401; 403; 802; 901	ARR

DX37.	Letter Engagement for Sale of Apartment 8B (KING-SCT-000000105-07)	802; 401; 901	
DX38.	Check # 1372 Signed by CC Wang 1/12/03 (WANG-SCT-000030855)	401	
DX39.	Check #1373 signed by CC Wang 1/12/03 (WANG-SCT-000030856)	401; 901	
DX40.	Check #1374 signed by CC Wang 1/12/03 (WANG-SCT-000030857)	401; 901	
DX41.	Check 116 Signed by CC Wang 1/31/03 (KING-SCT-000000489)	401; 901	
DX42.	Check #326 Signed by CC Wang 1/31/03 (WANG-SCT-000001644)	401; 901	
DX43.	Check #327 Signed by CC Wang 2/1/03 (WANG-SCT-000001645)	401; 901	
DX44.	Note regarding Ni Tsan incident (WANG 000438)	403; 802; 901	
DX45.*	Feb 3, 2003 Letter from YK King to Jose Dominguez (KING-SCT-000000132)		
DX46.	Codicil dated 2/10/03	403	
DX47.	Picture taken at Birthday Party (WANG 000280)	401	
DX48.	Picture taken at Birthday Party (WANG 000283)	401	
DX49.	Picture taken at Birthday Party (WANG 000278)	401	

DX50.	Last Will and Testament of CC Wang, 2/18/03 (AWSK_00003857)	403	
DX51.	Statement read by CC Wang at execution of Will on February 18, 2003 (WANG 000435-37)	401; 802; 602; 901; 403	
DX52.	Picture taken at Will Signing (WANG 000272)	401; 403	
DX53.	Picture taken at Will Signing (WANG 000273)	401; 403	
DX54.	Picture taken at Will Signing (WANG 000267)	401; 403	
DX55.	Feb 21, 2003 contract for the sale of apartment 8B (KING-SCT-000000091-99)	403	
DX56.	DNR order, 3/28/03 (WANG 022972)	401; 403	
DX57.	Healthcare Proxy 3/30/03 (WANG 022977)	401; 602; 403	
DX58.	Transfusion consent (Wang 02336)	401; 403; 602;	
DX59.	Picture with Joe Erlichster (WANG 000287)	401	
DX60.*	Order re Preliminary Letters (PA-SCT-000002201)		
DX61.*	Letter from Chaitman to Schram (Rose-SCT-00007324)		
DX62.*	Turnover list K001811-13		
DX63.	YK's Responses to the PA's Interrogatories (PA-SCT-000001372-1422)	403	ARR

DX64.	2/17/04 Appraisal by Arnold Chang for YK and Kenneth King (KING 000464-65)		
DX65.*	March 18, 2004 from Helen Chaitman to Peter Schram (Rose-SCT-00007434)		
DX66.*	Sotheby's Appraisal Agreement (AWSK_00000028-29)		
DX67.*	Email between Andrew Wang and Meeseen Loong, 9/20/04 (WANG001820)		
DX68.*	Sotheby's Appraisal (Sotheby's 000620)		
DX69.*	Email between Andrew Wang and Martin Klein, 12/15/04 (WANG001890)		
DX70.*	Email from Andrew Wang to Martin Klein, 12/15/04 (WANG 001892-93)		
DX71.*	Fax from Peter Schram to Martin Klein, 1/1/05 (King 007563)		
DX72.*	Email between Andrew Wang and Martin Klein, 1/7/2005 (WANG003406)		
DX73.*	Fax from Martin Klein to Peter Schram, 1/27/05 (King005955-56)		
DX74.*	Email between Andrew Wang and Martin Klein, 1/27/05 (WANG001947)		
DX75.*	Email between Andrew Wang and Elin Ewald		

	1/28/2005 (WANG001962-64)		
DX76.*	Email between Andrew Wang and Elin Ewald, 1/28/05 (WANG001952-54)		
DX77.	Letter to NYS DTF 2/3/05 (AWSK_00000587)	802; 403	ARR
DX78.*	Fax from Peter Schram to Martin Klein, 2/4/05 (PA000004)		
DX79.*	Email from Meseen Loong to Andrew Wang, February 9, 2005 (WANG001984-85)		
DX80.*	Email from Martin Klein to Peter Schram, 2/9/05 (King 007583-89)		
DX81.*	Contract for Raymond Ye sale 2/11/05 (WANG000617-626)		
DX82.*	Email between Elin Ewald and Ethel Griffin, 2/11/05 (EWALD_00000975)		
DX83.*	Escrow Agreement 2/11/05 (PA000009-17)		
DX84.*	North Fork Bank Statement 2-28-05 (WANG001684-85)		
DX85.*	Fax from Peter Schram to Martin Klein, 3/1/05 (KING 07569-70)		
DX86.*	Email between Andrew Wang and Elin Ewald, 3/9/05 (WANG002015-18)		

DX87.*	Email between Elin Ewald and Paula Powell, 3/9/05 (KING 008120)		
DX88.	Letter to IRS 3/11/05 (AWSK_00000604)	802	ARR
DX89.*	Fax from Martin Klein to Peter Schram, 3/11/05 (KING 006486-88)		
DX90.*	Email between Andrew Wang and Elin Ewald, 3/13/05 (WANG002457-58)		
DX91.*	Email between Andrew Wang and Elin Ewald dated 3/16/15 (EWALD_00000347)		
DX92.*	Email between Andrew Wang and Elin Ewald dated 3/16/15 (EWALD_00000214)		
DX93.*	Email between Elin Ewald and Ethel Griffin, 3/17/05 (EWALD_00000215)		
DX94.*	Email between Andrew Wang and Martin Klein, 3/21/05 (WANG002075-77)		
DX95.*	Email from Martin Klein to Peter Schram, 3/22/05 (King 007595-601)		
DX96.*	Contract for Chen Mei-Lin sale, 3/30/05 (WANG000994-1002)		
DX97.*	Escrow Agreement 3/30/05 (PA000077-86)		

DX98.*	Letter from Martin Klein to Peter Schram, 4/22/05 (PA000065)		
DX99.*	Fax from Martin Klein to Peter Schram, 4/29/05 (KING 006601-03)		
DX100.*	North Fork Bank Statement 4-30-05 (WANG001682-83)		
DX101.*	Letter from Martin Klein to IRS, 5/3/05 (AWSK_00000597-97)		
DX102.	O'Toole Ewald Report to Martin Klein 5/5/05 (EWALD_00000221)	702; 601; 802; 403	
DX103.	Fax from Martin Klein to Peter Schram, 5/10/05 (KING 006604-07)	702; 601; 802; 403	ARR
DX104.	Letter from Martin Klein to the IRS, 5/20/05 (AWSK_00000599-601)	802;602;403 as to second paragraph	ARR
DX105.*	Email between Andrew Wang and Martin Klein, 5/25/05 (WANG002106)		
DX106.*	Email between Martin Klein and Peter Schram, 5/25/05 (WANG002130-36)		
DX107.*	Email between Andrew Wang and Martin Klein, 5/27/05 (WANG003339)		
DX108.*	Letter from Martin Klein to Peter Schram 6/21/05 (KING 006608-17)		

DX109.*	North Fork Bank Statement 6-30-05 (WANG001680-81)		
DX110.*	Fax from Martin Klein to Peter Schram, 7/27/05 (KING 006941-45)		
DX111.*	July 29, 2005 letter from Marty Klein to Hugh Mo (KING 007571)		
DX112.*	Report from O'Toole-Ewald to Peter Schram, August 17, 2005 (KING 006952-53)	702; 601; 802; 403	
DX113.	O'Toole Ewald Report 8/25/05 (King 003147-48)	702; 601; 802; 403	
DX114.*	Fax from Peter Schram to Martin Klein, 8/29/05 (KING 006996-7003)		
DX115.*	Draft Yong-Qing Ye Agreement (AWSK_00000108-110)	802; 901	
DX116.*	Email between Martin Klein and Peter Schram, 9/6/05 (WANG002150-56)		
DX117.*	Contract for Yong Qing Ye sale, 9/22/05 (WANG000635-42)		
DX118.*	North Fork Bank Statement 9-30-05 (WANG001678-79)		
DX119.*	Fax from Martin Klein to Peter Schram, 12/13/05 (KING 007189-90)		

DX120.	O'Toole Ewald Report to Ethel Griffinm 12/15/05 (EWALD_00000225-26)	702; 601; 802; 403	
DX121.*	Email from Meseen Loong to Andrew Wang, December 20, 2005 (WANG002166-84)		
DX122.*	Email between Andrew Wang and Elin Ewald, 12/22/05 (EWALD_00000523)		
DX123.*	Contract for Yong Qing Ye sale, 1/26/06 (WANG000629-34)		
DX124.*	North Fork Bank Statement 2-28-06 (WANG1676)		
DX125.*	Sotheby's Fine Chinese Ceramics and Works of Art, March 30 2006, N08171 (AWSK_00000914 through AWSK_00001297)		
DX126.	Fax from Martin Klein to Peter Schram, 2/15/07 (000235-239)	401	
DX127.	IRS Memo (WANG002737)	106;(need complete record)	
DX128.	Amended 706 (Wang002698)	106;(need complete record)	
DX129.	Notice of Deficiency (AWSK_00000229)	401; 403; 802	ARR
DX130.	King Bankruptcy Petition (Docket No. 202-84)	403	
DX131.	King Bankruptcy Schedules (Docket No. 202-75)	403	

DX132.*	Fax from Martin Klein to Peter Schram, 4/23/08 (KING 007361-64)		
DX133.	O'Toole Ewald Report 5/2/08 (King 007375-7402)	702; 601; 802; 403	
DX134.	Fax from Elin Ewald to Peter Schram, 5/2/08 (KING 007365-74)	702; 601; 802; 403	
DX135.*	Email between Martin Klein and Andrew Wang, 5/6/08 (WANG002231-32)		
DX136.*	Email between Martin Klein and Andrew Wang, 5/19/08 (WANG002253-57)		
DX137.*	Email between Andrew Wang and Martin Klein, 5/23/08 (WANG002103)		
DX138.*	Email between Martin Klein and Peter Schram, 6/4/08 (WANG002258-65)		
DX139.	Declaration Amending Bankruptcy Schedules (Docket No. 202-85)	403	
DX140.*	Email from Martin Klein to Bonnie Brennan, August 20, 2008 (WANG003321-22)		
DX141.*	Email between Martin Klein and Sotheby's, 9/2/08 (WANG002284-87)		

DX142.*	Email between Crozier and Martin Klein, 9/3/08 (WANG002278-83)		
DX143.*	Email chain between Andrew Wang and Martin Klein, 3/8/09 (AWSK_00015263-67)		
DX144.*	Email from Andrew Wang to Martin Klein, 4/3/09 (WANG002306-07)		
DX145.*	Email from Martin Klein to Andrew Wang, 4/22/09 (WANG002318-25)		
DX146.*	Contract for Yu Da-Jin sale, 8/17/09 (WANG000644-49)		
DX147.*	Capital One Bank Statement September 2009 (WANG001673-74)		
DX148.*	May 18, 2010 email from Andrew Wang to Martin Klein, forwarded to Hilton Soniker, Catherine McGrath, and Peter Schram (AWSK_00007801)		
DX149.*	Letter from Martin Garbus to Peter Schram, 12/15/10 (KINGPROD5 - 00783-85)		
DX150.*	Letter from Peter Schram to Martin Garbus, 12/18/10 (KING7 - 001018-19)		
DX151.*	Petition for Limited Accounting 5/9/11 (AWSK 00009192-96)		

DX152.	Bill from Eaton Van Winkle, May 12, 2011 (KINGPROD5 - 00363-68)	802	
DX153.	Affirmation of Peter Schram and Exhibits A-C thereto (King-SCT-000003216-37)	802; 602; 403 (as to certain paragraphs)	
DX154.	Opell Affirmation (King-SCT-000006510-18)	802; 403; 701	
DX155.	DEMONSTRATIVE Chart showing movement of funds from accounts controlled by CC Wang to and among Northwich, Soon Huat, Tie Fung, and Goldwave; in the alternative, to the extent objected to, each of the underlying bank records identifying such transfers	401; 802; 602; 403; 702	
DX156.*	NY State Return (WANG_KING 000003386)		
DX157.*	Estate of CC Wang-Schedule D (PA 000001-PA 000003, PA 0000032-33, PA 0000048)		
DX 158.	UW Donation Receipt for Wang Yuanqi (WANG 02055)		

J. Damages²⁴²⁵

A. Plaintiff's Calculation of Damages for Non-Self-Dealing Breach of Fiduciary Duty, Fraud, Conspiracy to Defraud, and Civil RICO (1962(c)), and Conspiracy to Violate RICO (1962(d))

The Plaintiff calculates damages on its claims of breach of fiduciary duty (for any breaches other than a finding of self-dealing), fraud, conspiracy to defraud, violation of 18 U.S.C. §1962(c), and violation of 18 U.S.C. §1962(d) for the six sales occurring between 2005 and 2009 based upon the Defendants' procuring discounts on the Estate's asking price for each of the 98 paintings sold thereby (*i.e.*, the 2003 Sotheby's Appraisal Price + 20%) by means of fraudulent pretense. The plaintiff intends to show that whereas the PA understood that Andrew Wang was attempting to negotiate to receive 20% addition for all the sales, Andrew Wang was not so negotiating because he was the actual buyer.

Listed below is the amount sought in damages based upon the failure to include the 20% addition for each of the Estate's sales. The "OTE ####" descriptor used below is the designation given to each painting by the Estate's art consultant, O'Toole Ewald Art Associates prior to sale. Next to the OTE number is the name of the artist of the painting. The parenthetical to the right of the claim for damages describes the sale percentage increase over the 2003 Sotheby's appraisal value.

1. Wei Zheng – Price Discounts Achieved by Fraud

OTE #115 ShiTao - \$6,000 (0% increase on \$30,000 Sotheby's valuation from 2003)

Wei Zheng Total Damage from Fraudulent Discounts: \$6,000.00

²⁴ Plaintiff reserves and does not waive its calculations identified prior to the Court's November 9, 2021 Decision and Order precluding Mr. Patrick Regan's fair market valuation of the 98 Paintings as appreciation damages as well as the retail valuation of the 14 Paintings sold to Yue Da Jin in 2009. This includes its proposed damages valuation based upon disgorgement appended to the Defendants' motion to preclude.

²⁵ Defendants reserve and do not waive their objections to the belatedly disclosed damages calculations below.

2. Chen Mei Lin – Price Discounts Achieved by Fraud

OTE #130 Wang Hui - \$17,000 (0% increase on \$85,000 valuation)
OTE #129 NiZan - \$25,000 (10% increase on 250,000 valuation)
OTE #157 Shen Chou – \$12,000.00 (10% increase on \$120,000 valuation)
OTE #163 Various Artists - \$35,000 (0% increase on \$175,000 valuation)
OTE #223 Tang Yin - \$15,000 (10% increase on 150,000 valuation)

*Chen Mei Lin Total Damage from Fraudulent Discounts: **\$104,000.00***

3. Anthony Chou – Price Discounts Achieved by Fraud

OTE #100 Yao Shou - \$5,000 (10% increase on \$50,000 valuation)
OTE #162 Dragon - \$15,000 (10% increase on \$150,000 valuation)
OTE #220 Shen Zhou - \$40,000 (0% increase on \$200,000 valuation)

*Anthony Chou Total Damage from Fraudulent Discounts: **\$60,000.00***

4. Yong Qing Ye (1 of 2) - Price Discounts Achieved by Fraud

OTE #86 Bian Wu - \$500 (0% increase on \$5,000 valuation)
OTE #93 Chen Hongshou - \$2,800 (0% increase on 14,000 valuation)
OTE #121 Wang Hui - \$15,000 (0% increase on \$75,000 valuation)
OTE #123 Wang Yuanqi - \$16,000 (0% increase on \$80,000 valuation)
OTE #158 May Yuan - \$12,000 (0% increase on \$60,000 valuation)
OTE #159 Ma Yuan - \$12,000 (0% increase on \$60,000 valuation)
OTE #161 Xu Wei - \$30,000 (0% increase on \$150,000 valuation)
OTE #133 Li Song - \$5,000 (0% increase on \$25,000 valuation)
OTE #120 Wang Yuanqi - \$15,000 (0% increase on \$75,000 valuation)

*Yong Qing Ye (1 of 2) Total Damage from Fraudulent Discounts: **\$108,300.00***

5. Yong Qing Ye (2 of 2) - Price Discounts Achieved by Fraud

OTE #119 Bada Shanren – \$19,000 (0% increase on \$95,000 valuation)
OTE #156 Wang Jian - \$20,000 (0% increase on \$100,000 valuation)
OTE CCW #1008 - \$12,000 (0% increase on \$60,000 valuation)

*Yong Wing Ye (2 of 2) Total Damage from Fraudulent Discounts: **\$51,000.00***

6. Yue Da-Jin – Price Discounts Achieved by Fraud:

\$111,900 (10% decrease on \$559,500.00 cumulative valuation of 14 OTE paintings)

*Grand Total of Direct Compensatory Damages for All Six Sales: **\$441,200.00***

The Plaintiff seeks to hold Shou-Kung Wang and Andrew Wang jointly and severally liable for \$441,200.00 as the compensatory injury to the Estate under its fraud, breach of fiduciary duty (for any breach other than self-dealing and aiding and abetting self-dealing) and RICO theories. The Plaintiff reserves the right under 18 U.S.C. 1964 for RICO damages to be trebled and for pre-judgment interest under New York Law.

B. Plaintiff's Calculation of Appreciation Damages for Breach of Fiduciary Duty Through Self-Dealing.

Upon a finding by the jury that Andrew Wang breached his fiduciary duty by self-dealing (and that the Shou-Kung Wang aided and abetted this breach) with respect to any of the six sales identified above, the Plaintiff seeks to avoid the contracts and requests appreciation damages based upon the present value of the paintings. The amount awarded would be reduced by the price paid to the Estate with respect to each transaction the jury determines was subject to Andrew Wang's and Shou-Kung Wang's self-dealing. In view of the Court's November 9, 2021 order, the Plaintiff calculates the gross appreciation damages to be \$41,246,574.00.²⁶

	OTE Number	Alleged Buyer	Most Recent Auction Date and Location	Hammer Price
1	OTE #137	Anthony Chou	Chieftown 2010	\$336,000

²⁶ Defendants object to the proposed use of alleged subsequent auction records to calculate purported appreciation damages. As a matter of New York law, appreciation damages are to be calculated as of the time of trial, and the Court has already ruled that the purported auction results, only one of which occurred after 2016 and some of which are as much as 13 years old, cannot support a time-of-trial valuation. To the extent these records are admitted for some other purpose, Defendants will seek a limiting instruction. The Plaintiff responds that the most recent auction records are the most relevant evidence as to the present value of the paintings that is available given the absence of an appraisal by any expert. The Plaintiff's expert has opined that while it is ideal to have multiple on-point comparables that are very recent, it is not required or necessary. Moreover, the Daubert standard applies to the admissibility of persuasive expert testimony which may have undue weight on a jury, not to naked 401 arguments as to relevance. Under New York law as identified by the Court of Appeals, appreciation damages may be assessed through the use of "reasonable conjecture" and "best approximation" as derived from "common sense."

2	OTE #147	Anthony Chou	Beijing Chieftown 2008	\$441,600
3	OTE #135	Anthony Chou	China Guardian 2009	\$285,600
4	OTE #127	Anthony Chou	Beijing Chieftown 2009	\$844,800
5	OTE #1001	Anthony Chou	Poly 2010	\$336,210
6	OTE #241	Anthony Chou	Poly HK 2013	\$390,080
7	OTE #83	Anthony Chou	Beijing Chieftown 2008	\$252,000
8	OTE #92	Anthony Chou	Beijing Hao Shi 2015	\$655,500
9	OTE #94	Chen Mei Lin	Beijing Chieftown 2010	\$1,209,600
10	OTE #129	Chen Mei Lin	Beijing Hanhai 2010	\$6,552,000
11	OTE #153	Chen Mei Lin	Beijing Chieftown 2008	\$168,000
12	OTE #240	Chen Mei Lin	Holly's (Guangzhou Huayl) 2019	\$4,660,110
13	OTE #112	Chen Mei Lin	Beijing Chieftown 2008	\$853,760
14	OTE #136	Chen Mei Lin	Poly 2016	\$2,101,480
15	OTE #106	Wei Zheng	Beijing Chieftown 2008	\$456,000
16	OTE #115	Wei Zheng	Beijing Chieftown 2009	\$366,080
17	OTE #150	Wei Zheng	China Guardian 2016	\$1,457,581

18	OTE #224	Yong Qing Ye	Shanghai Jiahe Auction 2015	\$655,500
19	OTE #126	Yong Qing Ye (1)	Beijing Chieftown 2008	\$60,800
20	OTE #88	Yong Qing Ye (1)	Beijing Chieftown 2008	\$285,600
21	OTE #156	Yong Qing Ye (1)	Beijing Chieftown 2008	\$873,600
22	OTE #133	Yong Qing Ye (2)	Beijing Chieftown 2008	\$1,192,320
23	OTE #158	Yong Qing Ye (2)	Poly 2013	\$4,058,068
24	OTE #159	Yong Qing Ye (2)	Poly 2013	\$6,700,532
25	OTE #121	Yong Qing Ye (2)	Beijing Chieftown 2010	\$1,680,000
26	OTE #120	Yong Qing Ye (2)	Poly 2014	\$471,040
27	OTE #128	Yong Qing Ye (2)	Beijing Chieftown 2009	\$327,600
28	OTE #161	Yong Qing Ye (2)	Poly 2010	\$2,520,000
29	OTE #227	Yong Qing Ye (2)	Poly 2013	\$338,560
30	OTE #87	Yong Qing Ye (2)	Beijing Hanhai 2010	\$470,400
31	OTE #89	Yue Da Jin	Christie's HK 2014	\$159,903
32	OTE #201	Yue Da Jin	China Guardian 2016	\$86,250
<i>Grand Total Appreciation Damages</i>				\$41,246,574

The following amounts were paid to the Estate with respect to each purported sale:

\$395,730.00 – Wei Zheng Sale Price
\$1,380,200.00 – Chen Mei Lin Sale Price
\$901,800.00 – Anthony Chou Sale Price
\$779,200.00 – Yong Qing Ye (1 of 2) Sale Price
\$346,800.00 – Yong Qing Ye (2 of 2) Sale Price
\$484,920.00 – Yue Da Jin Sale Price

Total Sale Prices Paid to Estate: \$4,288,650.00 Accordingly, in the event the jury concludes all six sales were self-dealing sales, the net amount of recoupable appreciation damages would be: \$36,957,924.

The Plaintiff seeks an order that the non-resold paintings be returned to the Estate of Chi-Chuan Wang by the Defendants.

The Plaintiff seeks an order or pre-judgment interest at the rate of 9% per annum as of the date of the breaches identified in Section A above as of the date of each breach.

Plaintiff is further entitled to reasonable attorneys' fees upon a finding of liability against the Wangs on the Plaintiff's breach of fiduciary duty claims²⁷²⁸ or under RICO.

Upon a finding that Shou-Kung Wang aided and abetted Andrew Wang's breach, the Plaintiff would seek to hold Andrew Wang and Shou-Kung Wang jointly and severally liable.

C. Punitive Damages

The Plaintiff will seek the imposition of punitive damages against the Defendants stemming from the state law claims upon a finding of fiduciary breach or fraud (as well as aiding and abetting).

K. Less Than Unanimous Verdict

The parties do not consent to a less-than-unanimous verdict.

²⁷ *Estate of Rothko*, 84 Misc. 2d 830, 885 (Surr. Ct. New York Cnty. 1975) (noting that breaching executors would be charged with attorneys' fees by the successful petitioners for their misconduct).

²⁸ Defendants object to any claim that attorneys' fees are available as damages on a breach of fiduciary duty claim. The *Rothko* decision left the question of whether fees would be chargeable against the executors or against the estate for a future determination.

